

# Privacy policy

Last updated August 2026

## 1. Who we are and what this notice is about

We are Greenenergy Group Limited (company number 14687901) registered at Ilona Rose House, Manette Street, London W1D 4AL, a company that supplies traditional and renewable fuels globally (collectively referred to as “Greenenergy”, “we”, “us” or “our” in this privacy notice).

We are responsible for your personal data and are required to process it in accordance with applicable data protection law. This notice tells you how we collect, use, and protect your personal data when you interact with us, as well as your privacy rights and how data protection law protects you.

If, having read this privacy notice, you do not agree with how we use your personal data you should not give it to us. However, if you don't give us personal data or want us to stop using it, we might not be able to do business with you. For more details on why this is the case, please see section 3.4.

We keep our privacy policy under regular review. This version was last updated August 2026.

Our website is not intended for children, and we do not knowingly collect data relating to children.

## 2. Contacting us

If you have any questions or concerns about how we use your personal data, you can contact us by:

|           |                                                   |
|-----------|---------------------------------------------------|
| By post:  | Ilona Rose House, Manette Street, London, W1D 4AL |
| By phone: | +44 (0) 20 7404 7700                              |
| By email: | privacy@greenenergy.com                           |

## 3. What information we collect, use and why

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you as follows:

| Type of data                      | Examples                                                                                                                                                                                                                                   |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identity Data                     | First name, last name, title, job title, employer or company, date of birth (where applicable), and other information used to identify you.                                                                                                |
| Contact Data                      | Email address, telephone numbers, postal address and other contact details.                                                                                                                                                                |
| Financial Data                    | Bank account details and payment information, where you are an individual (such as a sole trader) or where otherwise necessary for our business relationship with you.                                                                     |
| Transaction Data                  | Details of transactions, payments and other information relating to the products and services we provide to or receive from you, where these relate to an identifiable individual.                                                         |
| Technical Data                    | Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website. |
| Usage Data                        | Information about how users navigate and use our website.                                                                                                                                                                                  |
| Marketing and Communications Data | Your preferences in receiving communications from us and records of your communication preferences, where applicable.                                                                                                                      |
| Enquiry and Correspondence Data   | Information contained in enquiries, correspondence, complaints, feedback and other communications with us.                                                                                                                                 |

## 3.1 Where we get your personal data from

We use different methods to collect data from and about you including through:

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| When you interact with us                   | <p>You may provide personal data when you:</p> <ul style="list-style-type: none"> <li>• Contact us through the website, by email, by telephone or otherwise;</li> <li>• Make an enquiry about our business, products or services;</li> <li>• Enter into or discuss a business relationship with us;</li> <li>• Supply products or services to us;</li> <li>• Attend a meeting, site or event;</li> <li>• Make a complaint or provide feedback; or</li> <li>• Request communications from us.</li> </ul>                                          |
| Automated technologies or interactions      | <p>As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns.</p> <p>We collect this personal data by using cookies, server logs and other similar technologies.</p> <p>Please see our cookie policy <a href="https://www.greenenergy.com/cookie-declaration/">https://www.greenenergy.com/cookie-declaration/</a> for further details.</p>                                                                                                                             |
| Third parties or publicly available sources | <p>We will receive personal data about you from various third parties and public sources as set out below:</p> <ul style="list-style-type: none"> <li>• Other Greenenergy Group companies;</li> <li>• Customers and suppliers;</li> <li>• Professional advisers;</li> <li>• Business partners;</li> <li>• Publicly available corporate information, such as Companies House, company websites and other publicly available business information;</li> <li>• Event organisers; and</li> <li>• Analytics and website-service providers.</li> </ul> |

## 3.2 Recordings

To the extent permitted by law, we may monitor or record communications with you, including emails and telephone calls, for security, quality assurance, training, compliance and evidential purposes. We also make use of CCTV at our premises and may retain recordings.

## 3.3 Your rights

By law we must have a “lawful basis” for collecting and using your personal data. Which lawful basis we rely on may affect your rights, which we have set out briefly below.

|                                         |                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Your right of access                    | <p>You have the right to ask us for copies of your personal data. You can request other information such where we get personal data from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.</p> <p><a href="#">You can read more about this right here.</a></p> |
| Your right to rectification             | <p>You have the right to ask us to correct personal data you think is inaccurate or incomplete.</p> <p><a href="#">You can read more about this right here.</a></p>                                                                                                                                                                                 |
| Right to erasure                        | <p>You have the right to ask us to erase your personal data. This right is not absolute and may not apply where we have a legal reason to continue processing your data.</p> <p><a href="#">You can read more about this right here.</a></p>                                                                                                        |
| Your right to restriction of processing | <p>You have the right to ask us to limit how we can use your personal data.</p> <p><a href="#">You can read more about this right here.</a></p>                                                                                                                                                                                                     |
| Your right to object to processing      | <p>You have the right to object to the processing of your personal data.</p> <p><a href="#">You can read more about this right here.</a></p>                                                                                                                                                                                                        |
| Your right to data portability          | <p>You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.</p> <p><a href="#">You can read more about this right here.</a></p>                                                                                                                                                          |
| Your right to withdraw consent          | <p>When we use consent as our lawful basis you have the right to withdraw your consent at any time.</p> <p><a href="#">You can read more about this right here.</a></p>                                                                                                                                                                             |

## 3.4 Our lawful bases for the collection and use of your data

Below sets out all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

| Purpose/Use                                                                                                                                            | Type of data                                                                                        | Legal basis                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Managing customer, supplier and business relationships, including responding to enquiries and communications                                           | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Enquiry and Correspondence   | (a) Performance of a contract with you (including steps before entering a contract)<br>(b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)<br>(c) Necessary to comply with a legal obligation                                                                                                                              |
| To carry out identity verification, sanctions screening, anti-money laundering, fraud prevention, credit and other due diligence checks where required | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction                                     | (a) Necessary to comply with a legal obligation<br>(b) Necessary for our legitimate interests (in protecting our business and complying with legal and regulatory requirements)                                                                                                                                                                                                      |
| To deliver our products and services to you, including:<br><br>(a) Manage payments, fees and charges<br>(b) Collect and recover money owed to us       | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to recover debts due to us)                                                                                                                                                                                                                                                                    |
| Website operation and security                                                                                                                         | (a) Technical<br>(b) Usage                                                                          | (a) Necessary for our legitimate interests (to operate, maintain, secure and improve our website, protect it against fraud and cyber threats, and ensure its functionality and availability)<br>(b) Necessary to comply with a legal obligation                                                                                                                                      |
| To use data analytics to improve our website, customer relationships and experiences                                                                   | (a) Technical<br>(b) Usage                                                                          | (a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)<br>(b) Consent, where analytics (Statistics) cookies are used, to understand how visitors use our website and to help us improve its performance and user experience |
| Business development and marketing communications                                                                                                      | (a) Identity<br>(b) Contact<br>(e) Marketing and Communications                                     | Necessary for our legitimate interests (to develop and grow our business and maintain relationships with existing and prospective customers, suppliers and other business contacts). Where required by law, we will only send marketing communications where we have obtained your consent                                                                                           |
| Business administration and corporate transactions                                                                                                     | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Enquiry and Correspondence   | Necessary for our legitimate interests (to operate, administer and protect our business, maintain appropriate business records, ensure effective corporate governance, and facilitate business reorganisations, mergers, acquisitions, disposals, financings, due diligence exercises and other corporate transactions)                                                              |

### 3.5 General uses

We may also process your personal data where:

- (i) We have legal obligations that we have to discharge;
- (ii) You have consented to such use; and/or
- (iii) To establish, exercise or defend our legal rights for the purposes of legal proceedings.

If you do choose to provide your consent, you can withdraw it at any time by contacting us (section 2).

We will keep this data only for as long as necessary depending on the purpose for which it was provided.

## 4. Exercising your rights

If you wish to exercise any of your rights, please contact us (section 2).

### 4.1 Fees

You will not be charged to exercise your rights.

We may charge a reasonable fee if your request is clearly unfounded, excessive, or if you request multiple copies of the information. In some cases, we may refuse to comply with such requests.

### 4.2 Response time

We aim to respond to all legitimate requests within one month.

If your request is complex or you have made multiple requests, it may take longer. We will notify you and keep you updated in such cases.

### 4.3 Identity verification

We may request specific information to confirm your identity and your right to access the data. This ensures that personal data is not disclosed to unauthorised individuals.

We may contact you for further information to expedite our response.

### 4.4 Accuracy of personal data

It is important that the personal data we hold about you is accurate and current.

Please inform us (by contacting us (section 2)) of any changes to your personal data during your relationship with us, such as a new address or email.

## 5. Sharing your information

We may share your personal data with third parties for the purposes outlined in the table "Purposes for which we will use your personal data". Such third parties may include:

- Other companies within the Greenenergy group;
- IT, website hosting, cloud storage, website development, cybersecurity, analytics, and other digital service providers who support the operation, maintenance and security of our website and business systems;
- Customers, suppliers, contractors, logistics providers, inspectors and other business partners where necessary to manage our business relationships or perform our contractual obligations;
- Providers of identity verification, sanctions screening, anti-money laundering, know-your-customer (KYC) and other compliance services, where necessary to comply with legal and regulatory requirements or to protect our business;
- Professional advisers, including legal advisers, accountants, auditors, insurers, bankers and other consultants who provide professional services to us; and
- Government bodies, regulators, law enforcement agencies, courts and other public authorities, where we are required or permitted to disclose personal data by law or to establish, exercise or defend legal claims.

We may also share your data with third parties if we sell, transfer, or merge parts of our business or assets. In such cases, the new owners may use your personal data as described in this privacy notice.

Where we engage third-party service providers to process personal data on our behalf, we require them to protect your personal data, act only on our instructions and comply with applicable data protection law. Other recipients, such as regulators, professional advisers and business counterparties, may process personal data as independent controllers where appropriate.

## 6. Where we store your information

We may transfer, use, and store your personal information outside the UK or European Economic Area (EEA).

Some of these countries may not offer the same level of data protection as those within the UK or EEA.

Additionally, your information may be processed by our staff or our suppliers' staff operating outside the UK or EEA, such as those providing support services.

Currently, we transfer data to the following countries outside the UK and EEA:

- Canada
- United States
- India
- Australia

These transfers to third-party service providers allow them to use and store your personal information on our behalf. We implement appropriate security measures to protect your data.

When transferring your information outside the UK and EEA, we use legally approved safeguards.

You can request more details and a copy of these safeguards by contacting us (section 2).

## 7. Keeping your information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

When your personal data is no longer required, we will securely delete or anonymise it in accordance with our data retention policies and applicable law.

For information on specific data retention periods, please contact us (section 2).

## 8. Security

We use technical and organisational measures to protect your personal data from loss and unauthorised access. We have procedures to handle suspected data breaches and will notify you and relevant regulators if required by law. Employees, agents, contractors, and third parties processing your data will do so under our instructions and are bound by confidentiality.

Internet data transmission is not completely secure. While we strive to protect your data (e.g., by encrypting outgoing emails), we cannot guarantee security during transmission to our website. Any transmission is at your own risk. Once we receive your data, we use procedures and safety features to prevent unauthorised access.

## 9. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>