

EURABELT FUELS GROUP

Compliance Division

PRIVACY POLICY

Sanctions Screening Portal

Document Reference: EFG-COMP-PPO-002

Data Controller	Eurabelt Fuels Ltd
Jurisdiction	United Kingdom
Contact	privacy@eurabelfuels.com
Applicable Law	UK GDPR / Data Protection Act 2018

1. INTRODUCTION

Eurabelt Fuels Group is committed to protecting the privacy and security of information processed through the Sanctions Screening Portal. This Privacy Policy explains how we collect, use, store, and protect data in connection with our sanctions screening services.

This policy applies to all users of the Sanctions Screening Portal, including authorised personnel of Eurabelt Fuels Group, Integrity Partners, and their designated representatives.

2. SANCTIONS DATA CLARIFICATION

IMPORTANT DISTINCTION

This Privacy Policy concerns the personal data of Portal USERS — not the subjects of sanctions designations. Sanctions data (names, identifiers, and details of sanctioned parties) is publicly available governmental data published specifically for public distribution and compliance use.

Sanctions data within the Portal is sourced **EXCLUSIVELY** from the six official governmental authorities:

- OFAC (United States) — treasury.gov
- EU Council — europa.eu
- OFSI (United Kingdom) — gov.uk
- Global Affairs Canada — canada.ca
- UN Security Council — un.org

- DFAT (Australia) — dfat.gov.au

No other sources are used. We do not subscribe to any commercial data providers.

3. DATA WE COLLECT FROM USERS

3.1 User Account Data

When users register for the Portal, we collect: name and job title, business email address, organisation name and address, and account credentials (encrypted).

3.2 Search Query Data

When users conduct sanctions screenings, we record: search terms entered, date and time of search, jurisdictions searched, search results returned, and the user who conducted the search.

3.3 Certificate Data

When Certificates are generated, we permanently record: certificate reference number, screened party details as entered, screening result, issuing user and organisation, and issue date and time.

3.4 Technical Data

We automatically collect: IP addresses, browser type and version, device information, and access logs with timestamps.

4. HOW WE USE DATA

4.1 Service Provision

We use collected data to: provide sanctions screening services, generate and verify Certificates, maintain audit trails for compliance purposes, and authenticate users.

4.2 Security and Integrity

We use technical data to: detect and prevent unauthorised access, monitor for security threats, maintain system integrity, and investigate potential breaches.

4.3 Legal Basis

Under UK GDPR, our legal bases for processing are: contract performance (providing the screening service), legitimate interests (security, fraud prevention), and legal obligation (maintaining audit records).

5. DATA RETENTION

Data Category	Retention Period
User Account Data	Duration of account + 7 years
Search Query Data	7 years
Certificate Records	PERMANENT (immutable)
Audit Logs	7 years minimum
Security Logs	2 years

Certificate records are permanent and immutable. This is fundamental to the integrity of the certification system. Certificates cannot be deleted upon request — see the Certificate Integrity Policy for full details.

6. DATA SHARING

6.1 We Do Not Sell Data

Eurabelt Fuels Group does not sell, rent, or trade user data or search query information to third parties.

6.2 Limited Disclosure

We may share data only with: service providers bound by confidentiality agreements, when required by law or court order, and within Eurabelt Fuels Group for service provision.

6.3 International Transfers

Where data is transferred outside the UK, we ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the Information Commissioner's Office.

7. DATA SECURITY

We implement technical and organisational measures to protect data, including:

- Encryption in transit (TLS 1.3) and at rest (AES-256)
- Multi-factor authentication for all user accounts
- Role-based access controls
- Regular security assessments
- Incident response procedures

8. YOUR RIGHTS

Under UK GDPR, you have the following rights regarding your personal data:

- Right of access: Request a copy of your data

- Right to rectification: Correct inaccurate data
- Right to restrict processing: Limit how we use your data
- Right to data portability: Receive your data in a portable format
- Right to object: Object to processing based on legitimate interests

Note: The right to erasure does not apply to Certificate records, which are permanent and immutable for system integrity reasons. See Section 5 and the Certificate Integrity Policy.

To exercise these rights, contact privacy@eurabelfuels.com. We will respond within one month.

9. 100-YEAR LEGACY COMMITMENT

Eurabelt Fuels Group is building for permanence. Our data protection practices are designed to operate for the next 100 years, ensuring consistent standards of privacy and security across generations.

10. CHANGES TO THIS POLICY

We may update this Privacy Policy periodically. Material changes will be notified to users via email or Portal notification. Continued use after notification constitutes acceptance.

11. COMPLAINTS

If you have concerns about how we handle your data, please contact privacy@eurabelfuels.com. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk.

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Building Integrity Through Transparency