

# PRIVACY POLICY

## FUTURA ENERGY DMCC

Effective Date: February 2026

### 1. Introduction

FUTURA ENERGY DMCC ("Company," "we," "us," or "our") is committed to protecting the privacy and security of personal information. This Privacy Policy describes how we collect, use, disclose, and safeguard your information when you visit our website, use our services, or otherwise interact with us.

We operate as a global energy trading company registered with the Dubai Multi Commodities Centre (DMCC) in the United Arab Emirates. This Privacy Policy applies to all personal data processing activities conducted by FUTURA ENERGY DMCC worldwide.

By accessing our website or using our services, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not access our website or use our services.

### 2. Data Controller Information

**Data Controller:** FUTURA ENERGY DMCC

**Registered Address:** Unit No: 1301, Platinum Tower, Plot No: JLT-PH1-I2, Jumeirah Lakes Towers, Dubai, United Arab Emirates

**Email:** legal@futuraenergy.com

**Telephone:** +971 527861804

### 3. Information We Collect

#### 3.1 Information You Provide Directly

We may collect information that you voluntarily provide to us, including but not limited to:

- **Identity Information:** Full name, title, date of birth, nationality, passport or identity document details
- **Contact Information:** Email address, telephone numbers, postal address, business address
- **Professional Information:** Company name, job title, professional qualifications, business registration details
- **Financial Information:** Bank account details, payment information, credit history, tax identification numbers
- **KYC Documentation:** Proof of identity, proof of address, beneficial ownership information, source of funds documentation
- **Communication Records:** Correspondence, inquiries, feedback, and any other information you choose to provide

### 3.2 Information Collected Automatically

When you visit our website, we automatically collect certain information, including:

- **Device Information:** IP address, browser type and version, operating system, device identifiers
- **Usage Information:** Pages visited, time spent on pages, click patterns, referring URLs
- **Analytics Data:** Aggregated website performance metrics through Vercel Analytics
- **Preference Data:** Language preferences, display settings

### 3.3 Information from Third Parties

We may receive information about you from third parties, including:

- Credit reference agencies and fraud prevention services
- Business partners and trading counterparties
- Regulatory authorities and public databases
- Professional advisors and service providers

## 4. Legal Basis for Processing

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We process your personal data on the following legal bases:

- **Contractual Necessity:** Processing necessary to enter into or perform a contract with you
- **Legal Obligation:** Processing necessary to comply with our legal and regulatory obligations, including anti-money laundering (AML) and know-your-customer (KYC) requirements
- **Legitimate Interests:** Processing necessary for our legitimate business interests, provided these are not overridden by your rights and interests
- **Consent:** Where you have given explicit consent for specific processing activities

## 5. How We Use Your Information

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We use your personal information for the following purposes:

- To provide, operate, and maintain our services and website
- To process transactions and manage our trading relationships
- To conduct due diligence, KYC, and AML compliance checks
- To communicate with you regarding our services, updates, and promotional materials
- To comply with legal and regulatory requirements
- To detect, prevent, and address fraud, security breaches, and other harmful activities
- To analyze and improve our website, services, and user experience
- To enforce our terms, conditions, and policies
- To respond to legal requests and prevent harm

## 6. Data Sharing and Disclosure

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We may share your personal information with the following categories of recipients:

### 6.1 Service Providers

We engage trusted third-party service providers to perform functions on our behalf, including hosting services, analytics providers, payment processors, and professional advisors. These providers are contractually bound to protect your information and use it only for the specified purposes.

## 6.2 Business Partners

We may share information with trading counterparties, business partners, and other entities involved in our energy trading operations, to the extent necessary for legitimate business purposes.

## 6.3 Legal and Regulatory Authorities

We may disclose your information to comply with applicable laws, regulations, legal processes, or governmental requests. This includes disclosure to regulatory authorities, law enforcement agencies, courts, and other governmental bodies.

## 6.4 Corporate Transactions

In the event of a merger, acquisition, reorganization, or sale of assets, your information may be transferred as part of the transaction, subject to appropriate confidentiality arrangements.

## 7. International Data Transfers

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As a global energy trading company, we may transfer your personal data to countries outside the United Arab Emirates, including countries in the European Economic Area (EEA), United Kingdom, United States, and other jurisdictions where we conduct business.

When we transfer personal data internationally, we implement appropriate safeguards to ensure your data receives an adequate level of protection, including:

- Transfers to countries with adequate data protection laws as recognized by relevant authorities
- Standard contractual clauses approved by the European Commission or other competent authorities
- Binding corporate rules for intra-group transfers
- Your explicit consent where appropriate

## 8. Data Retention

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We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, including to satisfy legal, regulatory, accounting, or reporting requirements. Retention periods may vary depending on the context and our legal obligations.

In general:

- **Transaction Records:** Retained for a minimum of 7 years following the completion of the transaction, in accordance with financial regulatory requirements
- **KYC/AML Documentation:** Retained for a minimum of 5 years after the end of the business relationship
- **Marketing Preferences:** Retained until you withdraw your consent or request deletion
- **Website Analytics:** Retained for up to 2 years

## 9. Your Rights

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Depending on your jurisdiction, you may have the following rights regarding your personal data:

- **Right of Access:** Request confirmation of whether we process your personal data and obtain a copy of such data
- **Right to Rectification:** Request correction of inaccurate or incomplete personal data
- **Right to Erasure:** Request deletion of your personal data in certain circumstances
- **Right to Restriction:** Request restriction of processing in certain circumstances
- **Right to Data Portability:** Receive your personal data in a structured, commonly used format
- **Right to Object:** Object to processing based on legitimate interests or for direct marketing purposes
- **Right to Withdraw Consent:** Withdraw consent at any time where processing is based on consent
- **Right to Lodge a Complaint:** Lodge a complaint with a supervisory authority

To exercise any of these rights, please contact us at [legal@futuraenergy.com](mailto:legal@futuraenergy.com). We will respond to your request within the timeframes required by applicable law.

## 10. Security Measures

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We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction.

These measures include:

- Encryption of data in transit and at rest
- Secure access controls and authentication mechanisms
- Regular security assessments and penetration testing
- Employee training on data protection and security
- Incident response and breach notification procedures
- Physical security measures at our premises

While we strive to protect your personal data, no method of transmission over the Internet or electronic storage is completely secure. We cannot guarantee absolute security of your information.

## 11. Third-Party Services

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Our website may contain links to third-party websites or services. We are not responsible for the privacy practices of these third parties. We encourage you to review the privacy policies of any third-party services you access.

We use the following third-party services that may process your personal data:

### 11.1 Google Analytics and Google Tag Manager

We use Google Analytics 4 (GA4) and Google Tag Manager (GTM), services provided by Google LLC, to analyze how visitors use our Website and to optimize our digital marketing efforts.

#### Data Collected:

- IP address (anonymized automatically)
- Browser type and version
- Device information (type, operating system)
- Pages visited and navigation paths
- Time spent on pages
- Approximate geographic location (country/city level)
- Traffic sources and referrers
- User interactions and events

**Purpose:** Website analytics, performance monitoring, user experience optimization, and traffic analysis.

**Legal Basis:** Your consent (for analytics cookies) and our legitimate interest in understanding website usage and improving our services.

**Data Retention:** Google Analytics data is retained for 14 months (GA4 default setting).

**International Transfer:** Data is transferred to and processed by Google LLC on servers in the United States and other countries. We have implemented Standard Contractual Clauses (SCCs) to ensure adequate protection.

**Your Rights:** You can opt out of Google Analytics tracking by installing the Google Analytics Opt-out Browser Add-on: <https://tools.google.com/dlpage/gaoptout>

**Google Privacy Policy:** <https://policies.google.com/privacy>

**Identifiers:** Google Analytics Measurement ID: G-GXCSFJLNXR | Google Tag Manager Container ID: GTM-PF3C5HZ5

## 11.2 Vercel Analytics

We use Vercel Analytics, a privacy-focused website analytics service provided by Vercel Inc.

- **Data Collected:** Anonymized page views, visitor counts, geographic regions (country-level), device types
- **Privacy-First:** Does not collect personal information, IP addresses, or enable cross-site tracking
- **Purpose:** Basic website traffic analysis and performance monitoring
- **Privacy Policy:** <https://vercel.com/legal/privacy-policy>

## 11.3 Content Delivery Networks

We use content delivery networks (CDNs) for efficient delivery of website resources such as JavaScript libraries, fonts, and media files. These services may collect anonymous usage data but do not track personal information.

## 12. Children's Privacy

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Our services are not directed to individuals under the age of 18. We do not knowingly collect personal information from children. If we become aware that we have collected personal data from a child without parental consent, we will take steps to delete such information.

### 13. Changes to This Privacy Policy

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We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or other factors. We will notify you of any material changes by posting the updated Privacy Policy on our website with a new effective date.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your information.

### 14. Governing Law

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This Privacy Policy shall be governed by and construed in accordance with the laws of the United Arab Emirates and the regulations of the Dubai Multi Commodities Centre (DMCC), without regard to its conflict of law provisions.

### 15. Contact Us

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If you have any questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

**FUTURA ENERGY DMCC**

Unit No: 1301, Platinum Tower

Plot No: JLT-PH1-I2, Jumeirah Lakes Towers

Dubai, United Arab Emirates

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**Telephone:** +971 527861804