

PRIVACY POLICY

Effective Date: July 23, 2019



1. Introduction

1.1. Associated Energy Group, LLC (“AEG”) respects your privacy and is committed to protecting your personal information. This privacy policy (“Policy”) describes our policies and procedures regarding personal information that we collect through or in connection with the purchase of our products and services, or in connection with the use of our website, www.aegfuels.com, and any other websites linking to this Policy (collectively, our “website”). This Policy does not apply to third party services that are not under AEG control.

1.2. It is important that you read this Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This Policy supplements other privacy policies and notices and is not intended to override them.

1.3. The term “personal information” as used in this Policy shall mean any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to you.

1.4. Personal information includes “special categories of personal information” and “pseudonymised personal information” but excludes anonymous information or information that has had the identity of an individual permanently removed.

2. Who we are

2.1. AEG is made up of different legal entities. This Policy is issued on behalf of AEG so when we mention "AEG", "we" or "us" in this Policy, we are referring to the relevant company in our group responsible for processing your personal information. Associated Energy Group, LLC is the controller and responsible for personal information processed in connection with the use of our website.

2.2. If after reviewing this Policy you have any questions or concerns please contact us using the contact details provided on our [Contact Us](#) page.

2.3. If you are based in the EU, you have the right to make a complaint to your local supervisory authority such as the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us in the first instance.

3. Changes to this Policy

3.1. Any changes we make to our Policy in the future will be posted on this page with a new Effective Date. We may also notify you by e-mail. Please check back frequently to see any updates or changes to this Policy.

3.2. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

4. Personal information we collect

4.1. We may collect and process the following categories of personal information:

- **Personal information you provide to us.** You may give us your personal information including name and contact details, by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information such as your name, postal or email address, and telephone number you provide when you ask us about, or purchase, our products or services; subscribe to our newsletter or other publications; register for an AEG Carnet Fuel Card; request marketing to be sent to you or give us feedback. We may also receive your personal information from your employer, operator or another third party, for example where we are providing Trip Support services such as customer & immigration clearance or arranging crew visas. If you would like to join our network, we will ask you for personal information such as name, address, telephone number, and email address. If you register on our website we will also collect a user name and password. If you submit an application for credit to us we will ask you for personal information including your name, postal address, telephone number, financial account history and information, education and employment history and status, and credit references; we may also request a credit report from a third-party credit bureau.
- **Personal information we collect.** When you access our website, our servers automatically collect technical information including, for example, Internet protocol (IP) address, web browser type and version, the operating system used and the domain name of your Internet service provider, etc. We may also collect information about your visit, including pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number, etc.

4.2. We use cookies and similar technology to collect aggregate (non-personal) information about website usage by all of our visitors and to help us remember you and your preferences when you revisit our website. These cookies may stay on your browser into the future until they expire, or you delete them. When you first access our website from certain jurisdictions, you may receive a message advising you that cookies and similar technologies are in use. For more information about our use of cookies, please see our Cookie Policy.

4.3. We support “do not track” signals (“DNT”).

5. Our use of personal information

5.1. We will only process your personal information in accordance with this Policy and the applicable law.

5.2. We will process your personal information for the following purposes as is necessary for the performance of a contract between you and us, or to answer questions or take steps at your request prior to entering into a contact:

- To create and manage our customer accounts and verify that you qualify as a registered user of the website;
- To respond to queries or requests that you submit and to provide you with the information, products or services that you request from us;
- To process orders or applications submitted by our customers;
- To notify our customers about changes or improvements or upgrades to the website or to our services;
- To administer or otherwise carry out our obligations in relation to any agreement our customers may have with us;
- To anticipate and resolve problems with any fuel or services supplied to customers;

- To process a customer's credit application pursuant to article 9 of our [General Terms and Conditions](#); and
- To administer any promotion or competition.

5.3. We will process your personal information for the following purposes as necessary for certain legitimate interests, or where you have given your informed consent to such processing if required by applicable law (such consent can be withdrawn at any time):

- To offer our services to you in a personalized way, for example, we may provide suggestions based on your previous requests to enable you to identify suitable products and services more quickly;
- To send you personalized marketing communications, in order to keep you informed of our and our selected partner's products and services, which we consider may be of interest to you; and
- To provide you, or allowing selected third parties to provide you, with information about products or services, that may interest you.

5.4. We will process your personal information for the following purposes as necessary in our legitimate business interests, (provided such interests are not overridden by your interests or fundamental rights):

- To monitor quality control and ensure compliance with any and all applicable laws, regulations, codes and ordinances;
- To analyze a customer's creditworthiness, risks or other matters relating to any extension of credit by AEG to a customer;
- To create products or services that may meet our customers' needs;
- To resolve any disputes;
- To ensure the security of your account and our business, preventing or detecting fraud or abuses of our website, for example, by requesting identity verification information in order to reset your account password (if applicable);
- To develop and improve our products, services and website, for example, by reviewing visits to our website and its various subpages, demand for specific products and services and user comments;
- To administer our website and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- As part of our efforts to keep our website safe and secure;
- To comply with applicable law, for example, in response to a request from a court or regulatory body, where such request is made in accordance with the law;
- To improve customer service and to assist us in identifying ways to provide better service or enhance user experiences with the website, our products or our services;
- To promote our products and services and those of third parties with whom we deal; and

5.5. We may process your personal information in order to protect your vital interests or the vital interests of another person.

6. Disclosure of personal information

6.1. There are circumstances where we wish to disclose or are compelled to disclose your personal information to third parties. This will only take place in accordance with the applicable law and for the purposes listed above.

6.2. We will disclose your personal information to:

- Our parent, subsidiaries, affiliates, branches or associated offices;
- Our agents, employees, and representatives;
- Our third-party providers or suppliers which may perform services arising out of or relating to customer accounts;
- Credit bureaus and/or reporting agencies;
- Our data center provider and web hosting provider;
- Our marketing partners, who may contact you by post, email, telephone, SMS or by other means (subject to your consent if required by the applicable law);
- Analytics and search engine providers that assist us in the improvement and optimization of our website. Your personal information is generally shared in a form that does not directly identify you;
- Third party service providers and consultants in order to protect the security or integrity of our business, including our databases and systems and for business continuity reasons;
- Another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganization, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal information will be permanently transferred to a successor company. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Policy;
- Any person, entity or governmental officer/agency/authority as required or permitted by law to do so, to the extent we deem it necessary, to enforce our agreements or to otherwise protect the rights, property or safety of ourselves, of our customers or of others or to comply with court orders, judicial proceedings, legal process served on us or requests by law enforcement or governmental agencies; and
- Any other third party where you have provided your consent (if required by the applicable law).

7. Children and privacy

Our website is not designed nor intended to be attractive to children under the age of 18, if you are not 18 years or older, do not use our website. We do not knowingly collect personal information from children under the age of 13. If we learn that personal information of persons less than 13 years-of-age has been inadvertently collected through our website, we will take the appropriate steps to delete this information.

8. International transfers of personal information

8.1. We are headquartered in the United States. Information you provide will be stored on our servers located in the United States. Your personal information may be accessed by us or transferred to us in the United States or to our affiliates, partners, or service providers who are located worldwide. If you are visiting our website or accessing our products and services from outside the United States, be aware that your information may be transferred to, stored, and processed in the United States where our servers are located, and our central database is operated.

8.2. Where we transfer EU personal information to a third party located in a country not recognized by the EU Commission as ensuring an adequate level of protection, we will take appropriate steps, such as implementing standard contractual clauses recognized by the EU Commission, to safeguard such personal information.

9. Security

9.1. We use reasonable technical, administrative and physical measures to protect information contained in our system against misuse, loss or alteration. In certain cases we use technology to protect information being transferred to our site, but no method of electronic transmission or storage is 100% secure. If we receive instructions using your log-in information we will consider that you have authorized the instructions.

10. Retention of personal information

We will store your personal information, in a form which permits us to identify you, for no longer than is necessary for the purpose for which the personal information is processed. We may retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements including our [General Terms and Conditions](#), and rights, or if it is not technically reasonably feasible to remove it. Consistent with these requirements, we will try to delete your personal information promptly upon request.

11. Data subject rights

11.1. If any of the information that we have about you is incorrect, or you wish to have information (including personal information) removed from our records, please contact us using the contact details provided on our [Contact Us](#) page.

11.2. Additionally, if you prefer not to receive marketing messages from us, please let us know by clicking on the unsubscribe link within any marketing message that you receive, or by sending a message to us using the contact details provided on our [Contact Us](#) page.

11.3. For residents of the EU only. In certain circumstances, you have the following rights under the data protection law in relation to your personal information:

- **Request access to your personal information.** You may have the right to request access to any personal information we hold about you as well as related information, including the purposes for processing the personal information, the recipients or categories of recipients with whom the personal information has been shared, where possible, the period for which the personal information will be stored, the source of the personal information, and the existence of any automated decision making.
- **Request correction of your personal information.** You may have the right to obtain without undue delay the rectification of any inaccurate personal information we hold about you.
- **Request erasure of your personal information.** You may have the right to request that personal information held about you is deleted.

- **Request restriction of processing your personal information.** You may have the right to prevent or restrict processing of your personal information.
- **Request transfer of your personal information.** You may have the right to request transfer of personal information directly to a third party where this is technically feasible.
- To exercise these rights, please contact us using the contact details provided on our [Contact Us](#) page.

11.4. For residents of California only.

Your California Privacy Rights. Section 1798.83 of the California Civil Code permits existing customers who are California residents to request once a year that we disclose the manner in which we have shared certain categories of your personal information with third parties for their direct marketing use. To request this disclosure please contact us using the contact details provided on our [Contact Us](#) page.

12. Third party links

Our website may, from time to time, contain links to and from the websites of our partner networks, affiliates and other third parties. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.