

Privacy Policy

Status 15th October 2020

The European Federation of Energy Traders (“**EFET**”) is committed to protecting and respecting your privacy. This Privacy Policy (the “**Policy**”), together with our General Terms of Use and any other documents referred to in it) sets out the basis on which any personal data which EFET collects about you, or that you provide to EFET, will be processed by us. The Policy shall apply to all users of the websites www.efet.org and www.efetacademy.org (collectively the “**Website**”), and to users of the EFET Document Ratification System (the “**EDRS Platform**”) from the date that they first apply for an account for the EFET online ratification platform.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

EFET (Amstelveenseweg 998, 1081 JS Amsterdam, The Netherlands) is the controller with respect to the personal data used on the Website and the EDRS Platform.

1. Personal data EFET collects from you

EFET collects and processes the following data about you:

- Information that you provide by filling in forms on our Website including without limitation information provided as part of applying to access registration-dependent parts of the Website including the Member’s Section, EFET Academy and the EDRS Platform. The information you give EFET may include your name, address, organisation name, job title, e-mail address, telephone number, log in details and payment details (where relevant).
- If you subscribe to our daily and weekly email update service, we will keep a record of your name and email address.
- If you contact us by email, telephone or otherwise, we may keep a record of that correspondence.
- If you upload documents to the EDRS Platform, we will store any personal data contained in these documents including your name, job title and signature.
- Information provided as part of a job application or other generic employment-related enquiry, which may include education certificates; experience information (such as education, skills, work experience and/or CVs, photograph, references, employee records and appraisals); demographic information (such as age, date of birth, gender); psychological test results
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Our Website may contain pictures of you when you have visited one of our receptions or other events.
- Data collected automatically. When visiting our Website, we collect data automatically through your browser or device, by making use of cookies and other technologies to track visitors on the Website and to collect information about your use of our Website. Please see our Cookie Policy further below to find out more.

- Any other personal data. that you disclose to us during the course of your contractual relationship with us, either voluntarily or upon request.

2. Legal bases of our use of your personal data

EFET collects and uses your personal data for the purposes below and on a lawful basis. Please know that insofar we already hold information about you, we may use that information for the same purposes.

For the performance of our agreement with you: In order to carry out our obligations arising from any contracts entered into between you and us, and to provide you with the information and services that you request, including managing and handling your requests, inquiries or complaints.

For our legitimate interests: Our legitimate interests include to analyse visits to and use of the Website, to improve and develop our services, to administer the Website, to give you a better user experience, for internal operations including troubleshooting, to understand and measure the effectiveness of the Website for relevant data analysis, statistical and survey purposes, to generate aggregated statistics, to ensure the security of our services and Website and to prevent fraud, hacking and spamming.

We also have a legitimate interest to administer and facilitate the functioning of the EDRS Platform, in particular by making any Ratification Letter available for inspection by other EDRS Platform users.

When you provide personal data to us as part of a job application or other generic employment-related enquiry, we have a legitimate interest to use such data (i) to administer and manage your application process, (ii) to assess your skills, qualifications and your suitability for our career opportunities, (iii) to take measures to verify that the information you have provided is true and accurate, e.g. by means of reference checks and (iv) to conduct background checks to the extent applicable law permits and required for your role;

Use of information based on your consent: We may use your personal data referred to above in the section ‘Personal data EFET collects’ to send you communications (such as newsletters, updates, opinions, news on events, etc.) via email or other electronic means, or via hardcopy mail, but we will only do so after we have received your consent to do so. We may also publish pictures of your visit at our events after we have received your consent to do so.

You can withdraw your consent at any time; see the section Your rights below.

To comply with our legal obligations: Any information referred to above in the section ‘Legal bases of our use of your personal data’ may be used to comply with a legal obligation to which we are subject, such as maintaining appropriate business records, complying with lawful requests by governmental agencies and public authorities and to comply with applicable laws and regulations or as otherwise required by law.

3. Where we store your personal data

The personal data that EFET collects from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating or third parties outside the EEA who work for or on behalf of EFET. Such staff or third parties may be engaged in, among other things, the processing of your payment details (if you have supplied any to us), the provision of support services and the review of documents uploaded by you to the EDRS Platform.

We or third parties we use will seek to ensure that all adequate safeguards are in place and that all applicable laws and regulations are complied with in connection with such transfer of personal data outside the EEA. This also means that we entered into legally necessary contracts with recipients of your data, including standard contractual clauses as approved by the European Commission or other supervisory authority where required.

You are entitled to receive a copy of any documentation showing the suitable safeguards that have been taken by making a request via secretariat@efet.org.

4. Data retention

We will retain the personal data processed by us for as long as necessary for the purposes for which the data was originally collected, unless a longer retention period is applicable under any applicable laws.

5. Use you may make of personal data

5.1 To the extent that you obtain personal data about other EDRS Platform account holders or Ratification Letter signatories, you agree that such information may only be used by you (including the organisation you represent) for the purpose of confirming the validity of the ratification process.

6. Disclosure of your information

6.1 Subject to applicable legal restrictions preventing us from doing so (including confidentiality and information barriers), we may disclose your personal data to any member of EFET.

6.2 Similarly, subject to applicable legal restrictions preventing us from doing so (including confidentiality and information barriers), we may disclose your personal data to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of EFET, our personnel, our members, other participating parties, or others. This could include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We may employ other companies to perform tasks on our behalf, such as payment processors, business partners, suppliers (such as IT service providers), sub-contractors for the performance of any contract we enter into with them or to provide services on our

behalf and analytics and search engine providers that assist us in the improvement and optimisation of our Website, such as Google Analytics. In providing their services, they will access, receive, maintain or otherwise process personal data on our behalf. Our contracts with these service providers do not permit use of your personal data for their own (marketing) purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your personal data and only process it in accordance with our instructions.

- If you upload a document to the EDRS Platform, at which point any personal data included in such document, in particular regarding the signatories, will become immediately available for viewing by other users of the EDRS Platform and other EFET Members.

7. Security

EFET will take reasonable steps to ensure that your personal data are properly secured using appropriate technical, physical, and organizational measures, so that they are protected against unauthorised or unlawful use, alteration, unauthorised access or disclosure, accidental or wrongful destruction, and loss.

We take steps to limit access to your personal data to those persons who need to have access to it for one of the purposes listed in this Privacy Policy. Furthermore, we contractually ensure that any third party processing your personal data equally provide for confidentiality and integrity of your data in a secure way.

8. Your rights

Subject to the conditions set forth in the applicable law, you have the right to request, review, correct, update, suppress, restrict or delete personal data that you have provided to us or if you would like to request to receive an electronic copy of such personal data for purposes of transmitting it to another company, by sending an email to secretariat@efet.org specifying your request. We will respond to your request consistent with applicable law.

In your request, please tell us what personal data you would like to have changed, whether you would like to have it suppressed from our database, or otherwise let us know what limitations you would like to put on our use of it. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain personal data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

In the event your personal data is processed on the basis of your consent, you can withdraw consent at any time by sending an email to secretariat@efet.org specifying your request, without affecting the lawfulness of processing based on consent before its withdrawal.

You may lodge a complaint with a supervisory authority, in particular in your Member State of residence, if you consider that the collection and use of your personal data infringes this Privacy Policy or applicable law.

9. Changes to our policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

10. Contact

Questions, comments and requests regarding this Privacy Policy should be addressed to secretariat@efet.org.

Cookie Policy

Status: 15th October 2020

This Cookie Policy ("**Cookie Policy**") sets out how The European Federation of Energy Traders ("**EFET**") uses cookies and similar technologies on the websites www.efet.org and www.efetacademy.org (collectively the "**Website**"). The Website is administered and operated by EFET (Amstelveenseweg 998, 1081 JS Amsterdam, The Netherlands).

EFET reserves the right to change (sections of) this Cookie at any time and without notice. It is recommended that you review this Policy periodically for changes.

General

- 1 We may collect information about your visits to the Website by using a "cookie" or similar technologies for storing information, such as local shared objects and web beacons, which we refer to collectively in this Cookie Policy as "**cookies**". A cookie is a small text file which is transferred to and stored on your computer, portable device or mobile. Cookies can be unique to your web browser and contain text and information such as a unique identifier, site name, digits and numbers. The information collected and stored is statistical data about our users' browsing actions and patterns and we do not use it to identify any individual.
- 2 Cookies are used to differentiate one user from another, to pass information from page to page during their visit to the Website and to collect data about a given browser, along with the information requested and sent by the browser's operator (the visitor). They enable us:
 - To estimate our audience size and usage pattern.
 - To store information about your preferences, and so allow us to customise the Website according to your individual interests.
 - To recognise you when you return to our site, in particular, if you are accessing registration-dependent parts of the Website.

What cookies do we use?

- 3 We use two different types of cookies on the Website: session cookies and persistent cookies. Session cookies are temporary files that only remain in the cookie file of your internet browser until you leave the Website. Depending on the cookie type, persistent cookies can remain for periods ranging from hours to years in the cookie file of your internet browser after you leave the Website and after your internet browser is closed.
- 4 The cookies we use are 'analytical' cookies (in particular, we use Google Analytics which provides us with meaningful reports on how visitors use the Website). The cookies we use are "first-party cookies" which means that they are set by the Website when you visit and the data collected by these cookies cannot be altered or retrieved by any service on another domain or by any third party.
- 5 Our uses of cookies basically fall into three categories:

- those that are strictly necessary to deliver the services and products you have requested
 - cookies related to the performance of the Website, such as Google Analytics
 - cookies related to the functionality of the Website, such as recognizing EFET Members logging in to member-only sections of the Website, or recognizing EFET Academy participants who have tendered payment.
- 6 The following table lists the principal cookies used on the Website, their purpose and the time they will be stored on your computer, portable device or mobile:

Cookie	Operation and Purpose	Is this a session or persistent cookie?
__utma	<p>This cookie is typically written to the internet browser on your first visit to our website from that internet browser. If the cookie is deleted from by the internet browser operator, and the internet browser subsequently visits our website a new __utma cookie is written with a different unique ID.</p> <p>This cookie is used to determine unique visitors to our website and is updated with each page view. Additionally, this cookie is provided with a unique ID that Google Analytics uses to ensure the validity and the accessibility of the cookie as an extra security measure.</p>	persistent
_utmb	This cookie is used to support analysis of how long visitors stay on our sites, in anonymous form.	session
__utmc	This cookie is used to support analysis about how visitors use our site, in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	session
__utmz	This cookie is used to support analysis about how visitors use our site, in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	persistent
BCSI-CS	This is used to measure how many visitors arriving at our website go on to read other pages.	session

- 7 For further information about Google Analytics, including in particular the use of __utma, __utmb, __utmc and __utmz cookies, please visit:
<http://www.google.com/analytics/learn/privacy.html>

How can you change your cookie preferences?

- 8 You may at any time refuse to accept or block cookies by activating the setting on your internet browser which allows you to refuse the setting of cookies. You may also be able to change the setting on your internet browser so that only particular types of cookies will be accepted.
- 9 If you would like to know more about cookies, including local storage devices, the following websites provide useful information:
- www.allaboutcookies.org
 - www.youronlinechoices.eu
 - <http://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>.
- 10 For a video about cookies visit www.google.co.uk/goodtoknow/data-on-the-web/cookies. You can also opt out of being tracked by Google Analytics across all websites by visiting <http://tools.google.com/dlpage/gaoptout> to find out how.
- 11 Please note, if you change your settings, you may be unable to access certain parts of the Website.



European Federation
of Energy Traders
SO YOU CAN RELY ON THE MARKET