

Fuel Sure Pte. Ltd.

Privacy Policy

This Privacy Policy explains how Fuelsure collects, uses, discloses, protects and otherwise processes personal data.

Effective date: 7 October 2026

Fuelsure is primarily subject to Singapore's Personal Data Protection Act 2012 (PDPA). Where another privacy law applies to a particular activity, including the EU GDPR or UK GDPR, we will comply with that law to the extent required.

1. Who we are

Fuel Sure Pte. Ltd. (UEN 202553154H) is a Singapore-based company providing marine fuel procurement transparency, supplier-performance intelligence, analytics, benchmarking and related digital services. Our registered office is 8 Marina Boulevard, #29-01 Marina Bay Financial Centre, Singapore 018981.

2. Scope

This Policy applies to personal data we handle in connection with:

- our websites, webforms, newsletters, demo requests and other online interactions;
- our platform, dashboards, APIs, integrations and related services;
- sales, contracting, pilots, onboarding, customer success, support and billing administration;
- supplier, partner, adviser, investor and other business relationships;
- events, webinars, meetings, surveys and business-development activities;
- recruitment and employment-related interactions; and
- security, visitor management, compliance and general business administration.

3. Our role

Depending on the circumstances, Fuelsure may act:

- **as an organisation or controller**, when we decide why and how personal data is processed for our own purposes, such as account administration, direct B2B engagement, contracting, invoicing, security, recruitment and website administration; and
- **as a data intermediary or processor**, when we process personal data on behalf of a customer to provide contracted services and in accordance with that customer's instructions.

Where we act as a data intermediary or processor, the relevant customer is generally responsible for deciding the purposes of processing and for meeting its own obligations to the individuals concerned. Additional data processing terms may apply under our customer agreement.

4. Personal data we may collect

- **Identity and business contact data:** name, work email address, telephone number, job title, employer, office address and similar details.
- **Account and authentication data:** usernames, account identifiers, permissions, authentication events, support history and configuration preferences.
- **Commercial and relationship data:** enquiries, proposals, pilots, contracts, service subscriptions, billing contacts, payment status, meeting notes and correspondence.
- **Operational and document data:** names, signatures, contact details, identifiers or comments that may appear in bunker delivery notes, lab reports, claims files, survey reports, Statements of Facts, stems, invoices, port or vessel documentation, attachments and other customer-provided records.
- **Compliance data:** beneficial-ownership information, sanctions-screening inputs, declarations and identity or verification materials where reasonably required.
- **Technical and usage data:** IP address, browser and device information, login timestamps, audit logs, pages viewed, referring URLs, diagnostics and cookie or similar-technology data.

- **Marketing and communications data:** subscription preferences, email engagement, event registrations, webinar attendance and survey responses.
- **Recruitment data:** CVs, employment history, education, references and interview notes, where relevant.
- **Security and access data:** visitor records and information relating to suspected misuse, security incidents or access control.

We do not intentionally seek sensitive personal data unless it is reasonably necessary for a legitimate business, legal, security or compliance purpose. If such data is provided to us, we handle it with additional care and in accordance with applicable law.

5. How we collect personal data

- directly from you when you contact us, create an account, request a demo, sign up for communications, attend an event, enter into a contract or otherwise interact with us;
- from your employer or organisation where you are a user, representative, employee, director, contractor or business contact;
- from customer or partner systems, documents and datasets made available to us for onboarding, integrations, benchmarking, analytics, reporting or support;
- from public and third-party sources such as corporate websites, professional networking sites, public registers, referral sources and compliance or sanctions-screening providers; and
- automatically through server logs, cookies, local storage and similar technologies when you use our websites or Services.

6. Why we process personal data

Purpose	Examples	Typical legal basis where applicable
Provide and support the Services	Set up accounts; ingest and analyse data; generate dashboards, benchmarks and reports; run pilots and integrations; respond to support requests.	PDPA consent or applicable exception; contract; legitimate interests where permitted.
Manage business relationships	Handle enquiries, proposals, contracting, onboarding, supplier/partner management, invoicing, renewals and account administration.	Contract; legitimate interests; consent where required.
Operate and improve the platform	Test, troubleshoot, secure, monitor and improve functionality, methods, workflows, service quality and user experience.	Legitimate interests; business-improvement exceptions where available; consent where required.
Compliance and risk management	Due diligence, sanctions screening, fraud prevention, audits, investigations, record keeping and legal/regulatory compliance.	Legal obligation; legitimate interests; statutory exceptions.
Communications and marketing	Send product updates, thought leadership, event invitations and other relevant B2B communications, subject to preferences and law.	Consent where required; legitimate interests where permitted.
Website, security and business continuity	Administer websites, logs, access controls, incident response, misuse prevention, backups and continuity.	Legitimate interests; legal obligation where applicable.

Under the PDPA, we rely on consent where required and on applicable statutory exceptions where available. Where the GDPR or UK GDPR applies, our legal bases may include performance of a contract, compliance with legal obligations, legitimate interests and consent. Where we rely on legitimate interests, we consider the relevant interests and the potential impact on individuals.

Where we rely on consent, you may withdraw it on reasonable notice. Withdrawal does not affect processing already carried out before it takes effect. Depending on the processing concerned, withdrawal may mean that we cannot provide a requested service or continue a particular interaction.

7. Data contribution, analytics and benchmarking

Customers may provide operational and commercial datasets so that Fuelsure can deliver benchmarking, supplier-performance and true-cost analytics. These datasets can contain limited personal data, for example names, work contact details, signatures or comments embedded in operational documents. We process such personal data only as needed for the relevant service or other permitted purposes described in this Policy and any applicable customer agreement.

We may create aggregated or de-identified statistics, benchmarks and analytical outputs from information available to us. Where information has been effectively de-identified so that an individual is no longer reasonably identifiable, it is not treated as personal data to the extent permitted by applicable law.

8. Who we may disclose personal data to

- our affiliates and group companies where necessary for governance, administration, shared services or business operations;
- customers, suppliers, business partners and integration partners where disclosure is reasonably necessary to provide or support the Services or manage the relationship;
- cloud hosting, identity, analytics, CRM, communications, security, backup, support and other technology service providers;
- professional advisers, auditors, insurers, financiers and corporate service providers;
- screening, KYC, compliance and fraud-prevention providers;
- regulators, courts, law-enforcement agencies and other competent authorities where required or appropriate;
- actual or prospective investors, lenders, purchasers or transaction counterparties in connection with a financing, merger, acquisition, restructuring or sale; and
- other parties with your consent or at your direction.

We do not sell personal data as part of our ordinary business model.

9. International transfers

Fuelsure operates from Singapore and may use service providers, partners and infrastructure located in other jurisdictions. Personal data may therefore be transferred outside Singapore. Where required, we take reasonable steps to ensure that transferred personal data receives a standard of protection comparable to that required by applicable law, including through appropriate contractual and organisational measures.

10. Retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, taking into account the duration of the relevant relationship, operational needs, security, legal and regulatory obligations, tax and accounting requirements, limitation periods, disputes and evidential requirements. When personal data is no longer required, we take reasonable steps to delete, anonymise or securely dispose of it.

11. Security

We maintain reasonable administrative, technical and physical safeguards designed to protect personal data against unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. Measures may include access controls, role-based permissions, authentication, logging, encryption or equivalent protections where appropriate, vendor due diligence, contractual controls, incident management procedures and staff awareness measures.

No system is completely secure. If a personal data breach occurs, we will assess it promptly and take containment, remediation and notification steps required by applicable law.

12. Cookies and similar technologies

Our websites and Services may use cookies, local storage and similar technologies to support core functionality, remember preferences, maintain sessions, understand usage, improve performance and measure communications. You can usually manage cookies through your browser or any cookie controls we make available. Where consent is legally required for non-essential technologies, we will request it before using them.

13. Your rights and choices

Subject to applicable law and relevant exceptions, you may have the right to:

- request access to personal data we hold about you and information about how it has been used or disclosed;
- request correction of personal data that is inaccurate or incomplete;
- withdraw consent previously given, on reasonable notice;
- opt out of direct marketing using the unsubscribe mechanism or by contacting us; and
- make a complaint to us or to the relevant supervisory authority.

If the GDPR, UK GDPR or a similar law applies, you may also have rights to erasure, restriction, objection, data portability and safeguards relating to certain solely automated decisions, subject to applicable conditions and exemptions.

14. Automated processing and analytics

Fuelsure may use rules, scoring logic, statistical methods, analytics and benchmarking methodologies to generate procurement, supplier-risk or performance insights. These outputs are designed primarily to support business users and organisations in decision-making. We do not intend to make decisions about individuals that produce legal or similarly significant effects solely by automated means unless permitted by law and supported by appropriate safeguards.

15. Personal data about other individuals

If you provide personal data to us about another individual, you are responsible for ensuring that you are authorised to do so and that any notices, permissions or consents required by applicable law have been provided or obtained.

16. Third-party websites and services

Our websites, reports and communications may link to third-party websites, platforms or applications. Those third parties operate under their own privacy notices and terms, and we are not responsible for their practices.

17. Children

Our Services are designed for business users and are not intended for children. We do not knowingly collect personal data from children through our ordinary business activities.

18. Changes to this Policy

We may update this Policy from time to time. The latest version will be made available on our website with its effective date. Material changes may also be communicated through the Services, by email or through other appropriate channels.

19. Contact us / Data Protection Officer

For questions, requests or complaints about this Policy or our handling of personal data, contact:

Data Protection Officer

Fuel Sure Pte. Ltd. (UEN 202553154H)

8 Marina Boulevard, #29-01 Marina Bay Financial Centre, Singapore 018981

info@fuelsure.io

<https://fuelsure.io>