

# **STX Privacy Policy**

Version 2.0

Last Updated 11 November 2025

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## 1 Welcome to STX

- 1.1 We are STX Commodities B.V. (**STX, we, our** or **us**) and we operate the website <https://platform.climatetech.stxgroup.com> (**Site**) and the portal which is an online portal to facilitate communication between STX customers and STX (**Portal**) (the Site and the Portal together the **Platform**). Our business address is Gelrestraat 30, 1079MZ Amsterdam, the Netherlands.
- 1.2 This privacy policy (**Policy**) outlines the types of data we collect when you use our Platform, the purposes they serve and how your personal data is protected.
- 1.3 Your access to, and use of, the Platform implies your binding agreement to and acceptance of this Policy. If you do not agree with the terms of this Policy, please do not use the Platform.
- 1.4 This Policy, along with the following additional policies, are the rules governing your rights and obligations in respect of the Platform:
  - Terms of Use; and
  - Cookies Policy,
 (together, the **Policies**).

## 2 How We Use Our Policy

- 2.1 This Policy outlines the types of data we collect through the use of our Platform, including any data you may provide when you register for an account. This Policy pertains to all users engaging with the Platform, by continuing to use our Platform, you are consenting to the terms of this Policy. We are dedicated to keeping you informed when it comes to your online privacy and focus on promoting transparency between you and us and upholding compliance in respect of privacy laws.
- 2.2 In addition to this Policy, users are advised to review and be aware of the terms that govern their use of our Platform, including our Cookies Policy, Terms of Use and any other terms which we may communicate to you from time to time.

## 3 Information We Collect & Receive & the Purpose and Our Lawful Basis

- 3.1 By engaging with and using the Platform, you consent to us collecting, receiving, processing, storing and transferring the following information for the purposes listed below:

Information Category	Purpose / Activity	Lawful Basis
<b>Personal Identification Information</b> - this may include names, email addresses, company affiliations and phone numbers and any other data which you submit through the use of the Platform.	To facilitate user engagement, user onboarding, account management and communication. This includes processing to administer our relationship with you and communicate with you and your use of the Platform.	(a) the processing is <b>necessary to our performance of a contract</b> with you; and (b) it is our <b>legitimate interest</b> to review and respond to any correspondence or queries you send to us, and to send service information regarding our Platform and/or services that you have used on our Platform.
<b>Demographic Information</b> - this may include user location address, and other background information that you consent to	To enhance user experience and tailor services to specific geographic preferences with user consent.	(a) your <b>consent</b> or where information is solicited; and (b) the processing is <b>necessary to our performance of a contract</b> with you; and

providing through the use of our Platform.		
<b>Product/Service Details</b> - this may include details about the products being marketed on our Platform, including information supplied by the user.	Are collected and processed to accurately represent and manage transactions and interactions within the Platform and to allow the Platform to function.	The processing is <b>necessary to our performance of a contract</b> with you.
<b>Technical Data</b> – this may include IP addresses, browser types and operating system.	To allow the seamless and secure operation of our Platform and enhance user security. To help us keep the Platform available and improve your experience when you visit it. We use this information to help us understand how people visit our Platform and access the services on our Platform and ensure that we can continue to maintain and improve the Platform to service your needs.	(a) necessary to comply with relevant <b>legal obligations</b> (for example, applicable data protection/privacy laws). (b) necessary for our <b>legitimate interests</b> to act in, and protect, the interests of our business. Platform users should also read our Cookies Policy which is available on the Platform.
<b>Usage Data</b> – this may include pages visited and previous website addresses including any search terms used and links clicked and the date and time you access the Platform and how you use the Platform.	In order to analyse user engagement patterns and improve the overall user experience, with user consent. To help us to keep the Platform available and improve your experience when you visit it. This includes: (a) statistical analysis to improve, test and monitor the effectiveness of the Platform; (b) to monitor metrics such as total number of visitors and traffic data (including demographic patterns); and (c) to ensure content on the Platform is presented in the most effective manner for you and to enhance your use of the Platform.	(a) your <b>consent</b> or where information is solicited; (b) our <b>legitimate interest</b> to measure the use of our Platform and/or services on it and your interactions to inform and improve service direction and development and to enable provision of accurate and reliable reporting; and/or (c) the processing is <b>necessary to our performance of a contract</b> with you.
<b>Marketing and Communications Preferences</b> – this may include frequency or	Enable us to control the frequency and nature of communications you receive from us. To send you	(a) our <b>legitimate interest</b> to send you communications related to the services on the Platform to which you have

method of communications which are sought from you and also includes the Personal Identification Information.	marketing material, newsletters and other related information, and to send solicited information (e.g. in response to an enquiry).	previously used, where permitted by privacy laws; or (b) your <b>consent</b> or where information is solicited.
<b>Third-Party Data</b> – this may include information collected from external sources.	This information is collected from external sources or third parties and used strictly for disclosed purposes.	The processing is <b>necessary to our performance of a contract</b> with you.
<b>Aggregated Data</b> - this may include statistical or demographic data but is not considered personal data as it does not reveal individual identities and is used for analytical purposes, Platform improvement and industry insights.	This data is not considered personal data. But we intend to use such data to enable us to continue and grow our Platform and business.	Necessary for our <b>legitimate interests</b> to ensure we can protect and grow our business.

3.2 In limited circumstances we may process any of the **Personal Data** we hold to the extent necessary to defend, establish and exercise legal claims or to comply with legal or regulatory obligations.

3.3 Where we need to collect personal data due to a legal or regulatory obligation, or for performance of a contract, and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the use of the Platform or the Site). We will notify you of this at the time.

## 4 How We Collect Your Information

We use various methods to collect data from and about you which includes through:

- your interactions with us: you may provide us with personal data by filling out information on our Platform or corresponding with us. This includes personal data you provide when you create an account on our Platform, give us feedback or contact us.
- automated technologies or interactions: through your interaction with our Platform, we will automatically collect Technical Data about your browsing actions and patterns. We collect this personal data by using cookies and other similar technologies, further information of which is available in our Cookie Policy.
- third parties or publicly available information: we may receive personal data from time to time about you from a variety of third parties and public sources of information.

## 5 How We Share Your Information

5.1 We may share your data with third parties where necessary to provide access to, and use of the Platform, perform the services on our Platform, comply with our legal obligations or for the purposes set out in this Policy, including:

### Employees and Collaborators

We may share your information with our employees and collaborators of STX or any other company within the STX group.

### Service Providers and Partners

- 5.2 We may share your information with trusted service providers and partners who assist in providing and enhancing our services. These entities have limited access to your information, adhere to strict confidentiality and data security standards to ensure the protection of your information, and may only use your information to help us operate, provide and advertise the Platform and our services in accordance with our instructions to them.

#### **Business Transfers**

- 5.3 In the event of certain business transfers which includes mergers, acquisitions and other relevant transfers, your information may be transferred as part of the business assets to ensure continuity of service and maintain a seamless user experience.

#### **Legal Obligations**

- 5.4 We may disclose information in response to requests by the courts of a competent jurisdiction, or as a result of other regulatory requirements, government agencies or law enforcement requests, including situations where disclosure is necessary to comply with applicable laws or regulations, safeguard the rights, privacy, and security of our users and STX, including to protect our proprietary rights, detect, investigate, prevent, stop or remediate fraud, privacy issues or security incidents relating to our systems and networks.

#### **User Consent**

- 5.5 In circumstances not covered by section 5.4 above, we share information with your consent, allowing you control over the sharing of your information.

## **6 How We Transfer Your Information**

- 6.1 Your personal data will be processed and stored within the European Union, the UK or in countries that are either retained by the European Union or the UK to have an adequate level of protection for your personal data according to a specific decision of adequacy of the European Commission or the UK Information Commissioner or if no adequacy decisions exists, for which we have otherwise put in place appropriate safeguards to protect your personal data, as more particularly described in section 6.4 below.
- 6.2 In certain instances, your information may be transferred across international borders as part of our operations. This includes scenarios where our group members, service providers, partners, or servers are located in different countries. These are for the purposes outlined above.
- 6.3 To safeguard your information during international transfers, we implement protective measures consistent with data protection standards. These measures may include the use of encryption, contractual agreements with data processors, or reliance on internationally recognised frameworks that ensure an adequate level of protection for your data.
- 6.4 Should we transfer personal data to countries outside the EEA, including the US that do not benefit from an adequacy decision, we put in place appropriate safeguards to protect your personal data – e.g. the EU standard contractual clauses or the UK Addendum as necessary, unless a relevant exemption applies.
- 6.5 We are committed to compliance with international data protection laws governing cross-border data transfers. This commitment extends to adhering to applicable frameworks, regulations, and mechanisms that ensure the lawful and secure transfer of user information across borders.

## **7 How We Use Cookies & Other Tracking Technologies**

Our use of cookies and other tracking technologies is governed by our Cookies Policy. We are committed to transparency in our data practices, and you can find detailed information about the types of cookies used, their purposes, and your control options in our Cookies Policy. Please take a moment to review our Cookies Policy. Your continued use of our Platform indicates your acceptance of the terms outlined in our Cookies Policy.

## 8 How We Use Third-Party Links & Services

8.1 Certain features or services of the Platform may involve third-party applications or services. In such cases, if you decide to engage with the third-party for the provision of certain applications or services, these third parties may have their own privacy policies and terms of service, and we encourage you to review them to understand how they collect, use, and handle your information.

## 9 How We Protect Your Information

We prioritise the security of your information by implementing robust security measures including encryption, access controls, and other industry-standard protocols. These measures are designed to safeguard your data from unauthorised access, disclosure, alteration, and destruction, ensuring the confidentiality and integrity of your information. Measures involve:

- regular security audits: including periodic reviews and security audits to evaluate and enhance our Platform's security. These assessments identify potential vulnerabilities, address emerging threats, and ensure that our security measures align with evolving industry standards and best practices.
- employee training: whereby our commitment to data security extends to the provision of comprehensive data protection training for our employees. This training ensures a collective commitment to upholding the highest standards of data privacy and security of your information.
- incident response plans: where, in the event of a potential data breach, we have established incident response plans which outline procedures for promptly detecting, responding to, and mitigating the impact of security incidents. Our response is aimed at minimising potential harm, resolving issues promptly, and maintaining the trust and confidence of our users.

## 10 How Long We Store Your Information

10.1 We only store your information for the duration necessary to fulfil its intended purpose. The determination of the retention period is based on the necessity of processing the information for your access to, and use of, the Platform, services provided and other legitimate business purposes. Most of our retention periods are determined on the basis of this general rule.

10.2 The specific timeframes for retaining various data types are established by taking into consideration our legal requirements, contractual obligations, and user consent. These retention periods are outlined below and are periodically reviewed to ensure continued relevance and compliance:

Purpose of Processing	Retention
Information which is used to provide you with access to, and use of the Platform, and our services	Retained for the lifetime of your account with us unless another purpose of Processing in respect of the applicable information requires a longer retention period.
Information which is used for regulatory and legal compliance and obligations	Retained to extent necessary to comply with our legal obligations.
Information which is used for other legitimate purposes	Retained for other legitimate purposes such as investigating potential violations for our policies or Terms of Use, promoting safety, security and integrity and protect us and our rights, property or the Platform.

- 10.3 Upon expiration of the data retention period, we employ secure methods for data handling, which may include deletion or anonymisation. This ensures that data no longer needed for its original purpose is responsibly managed, reducing the risk of unnecessary exposure and aligning with privacy principles.

## 11 Automated Decision Making

At present, we do not undertake any automated decision making.

## 12 How We Anonymise & Aggregate Data

- 12.1 Data collected via our services may be anonymised, where applicable, and aggregated for statistical analysis or other lawful purposes. This may include collaboration with research institutions and environmental agencies if applicable and the sale of such anonymised personal data and related analysis conducted in respect of such.
- 12.2 We take all reasonable measures to ensure that, where applicable, once data is anonymised or aggregated, it cannot be used to identify an individual.

## 13 Your Rights & Choices

- 13.1 Certain privacy laws (which includes the General Data Protection Regulation) provide users with rights and choices related to their personal information. In consistency with those laws, we give you the choice of accessing, editing, or removing certain information as well as choices about our communications with you. Subject to applicable law, you may have some rights with respect to your personal information such as:

Right	What you can do
<b>Right to be informed</b>	You have the right to be informed about the collection and use of your personal data, as detailed in this Policy and by contacting us at <a href="mailto:compliance@stxgroup.com">compliance@stxgroup.com</a> . You can access and update your personal information through your account settings when logged into your account on our Platform.
<b>Right to access</b>	You have the right to access and receive a copy of your personal data and supplementary information by contacting us at <a href="mailto:compliance@stxgroup.com">compliance@stxgroup.com</a> .
<b>Right to portability</b>	You have the right to data portability, which allows individuals to obtain and reuse their personal data for their own purposes across different services by contacting us at <a href="mailto:compliance@stxgroup.com">compliance@stxgroup.com</a> .
<b>Right to rectification</b>	You have the right to have inaccurate personal data rectified, or completed if it is incomplete by reference to your Account settings or by contacting us at <a href="mailto:compliance@stxgroup.com">compliance@stxgroup.com</a> .
<b>Right to restrict processing</b>	You have the right to request the restriction or suppression of your personal data by contacting us at <a href="mailto:compliance@stxgroup.com">compliance@stxgroup.com</a> .
<b>Right to deletion/erasure</b>	You have the right to have personal data erased by contacting us at <a href="mailto:compliance@stxgroup.com">compliance@stxgroup.com</a> .
<b>Right to object</b>	You have the right to object to the processing of your personal data in certain circumstances by contacting us at <a href="mailto:compliance@stxgroup.com">compliance@stxgroup.com</a> .

- 13.2 We try to respond to all legitimate requests within one month of receiving the request. Occasionally, it may take longer if the request is complex or you have made a number of requests. In this case we will ensure to communicate this to you and keep you updated. If you wish to make a request or exercise any of your rights mentioned above, you should contact us at the address set out in the "Contact Us" section of this Policy.

- 13.3 As part of your rights, you are entitled to **file a complaint** with applicable data protection regulator, which in the Netherlands is the Autoriteit Persoonsgegevens, if you believe that your data protection rights have been violated.

## 14 Your Responsibilities

- 14.1 We emphasise the importance of keeping your personal information current and correct. You are encouraged to regularly review and update your information to ensure its accuracy and relevance.
- 14.2 You must prioritise the safeguarding of your account credentials and must refrain from sharing your credentials with unauthorised users of your account and adopt secure password practices, such as using strong, unique passwords and enabling multi-factor authentication when required by us.
- 14.3 We urge you to familiarise yourself with the privacy policies and terms of relevant third parties associated with our Platform. This includes external services, partners, and integrated functionalities. Reviewing third-party policies ensures that you are aware of how your information may be handled beyond our platform.

## 15 Changes to Privacy Policy

This Policy is subject to change at any time, we will revise the “Last Updated” date at the top of this Policy. Where practical, we will notify you of any significant changes by email, however by continuing to use the Platform, you acknowledge and agree that you it is your responsibility to review this Policy and we encourage you to do so to stay informed about how we are helping to protect the information we collect. It is your responsibility to be aware of any changes and your continued use of the Platform shall constitute your agreement to this Policy and any updates.

## 16 Contact Us

- 16.1 For enquiries relating to this Policy, you can reach out to us and our nominated Data Protection Officer at [compliance@stxgroup.com](mailto:compliance@stxgroup.com). We value open communication and are committed to addressing any concerns or questions that you may have regarding this Policy.
- 16.2 Additionally, for data protection requests and concerns, users also have the right to make a complaint to the applicable data protection regulator which in the Netherlands is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) <https://www.autoriteitpersoonsgegevens.nl/en>.
- 16.3 For queries specifically related to cookies and their usage, users are encouraged to refer to our Cookies Policy.