

# Listed purposes for processing personal data

Reference: Vitol

Date: updated 15 April 2019

## Legal uses and reasons

Purposes of processing	Lawful basis				Special category personal data
	Your explicit consent	Contract	Legal obligation	Lawful business reason	
<b>Contact Information</b>					
Dealing with you when we are making trades through you with your employer or organisation (including call recording and record keeping of trades)			✓ (for call and other records of trades)	✓ (This is core to Vitol's business)	
Inviting you to Vitol-organised events				✓	This may occasionally reveal health-related information, such as when you inform us of special accommodation or dietary requirements in relation to events to be attended. This information will be processed at your request and with your consent.
<b>Background and Identity Check Information</b>					
Performing anti-money laundering checks in relation to KYC (Know Your Business Checks) and credit risk assessments to meet legal obligations and comply with good governance, internal policies and risk management			✓	✓	This may occasionally reveal race / ethnicity details or criminal offence details but is required to meet legal obligations
<b>Visa applications</b>					
Using passport, visa and contact information to obtain invitation letters or visas necessary for visits to Vitol or Vitol-related events at your request and dealing with information needed to meet visa requirements for the relevant countries to be visited	✓				This may reveal race /ethnicity or other sensitive details as we comply with visa requirements but use will be at your request

Purposes of processing	Lawful basis				Special category personal data and with your consent
	Your explicit consent	Contract	Legal obligation	Lawful business reason	
<b>Website Information</b>					
Ensuring the proper operation and performance of the website, monitoring its use, security and integrity on an ongoing basis and checking and improving its functionality for users.				✓	
<b>General Business and Compliance Purposes</b>					
Establishing and enforcing our legal rights and obligations, monitoring to identify and record fraudulent activity online, preventing and detecting crime  Meeting legal obligations for data security			✓	✓	
Ensuring appropriate use of our website in accordance with its terms and conditions and our policies to keep it operating efficiently for other users				✓	
Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities			✓		
Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory bodies and authorities				✓ (We wish to cooperate as necessary or advisable with proportionate requests from authorities and/or volunteering such details to them in appropriate cases. This is also in the public interest)	
Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Vitol's compliance with relevant legal			✓		

Purposes of processing	Lawful basis				Special category personal data
	Your explicit consent	Contract	Legal obligation	Lawful business reason	
and regulatory requirements					
For our general record-keeping and customer/supplier relationship management, for compliance with accounting, taxation and other legal obligations and otherwise for good governance, insurance requirements and risk management, including obtaining professional advice and dealing with claims			✓	✓	
Managing our investment in, or acquisition of third party entities, including reviewing and analysing remuneration details of key employees as part of our financial analysis and in order to make investment decisions				✓	
Granting you power of attorney to act on behalf of one or more of our businesses		✓	✓	✓	