



Spark Commodities Privacy Policy

Version: 2.0

Last Updated: February 2023

Spark Commodities is committed to protecting your privacy. This Privacy Policy describes what kind of Personal Data we collect about you, how we collect it, how we use it, with whom we share it, and what choices you have regarding it. This Privacy Policy is incorporated into and forms part of the Spark Terms of Use on Spark Commodities' website, which can be found here: www.sparkcommodities.com (Site). We encourage you to become familiar with the terms and conditions of both this Privacy Policy and the Terms of Use. By accessing and using the site, you agree that you have read and understand this Privacy Policy and you accept and consent to the privacy practices (and any uses and disclosures of information about you) that are described in this Privacy Policy.

Identity of the Data Processor

Spark Commodities Pte Ltd (hereafter "Spark Commodities", "we" or "us"), a company registered in Singapore with 201909431K as the ACRA registration number (hereinafter "**Spark**").

Collection of Personal Data

Spark will receive and/or collect Personal Data of the members, clients, employees or representatives of companies ("Data Subject"). This includes any kind of Personal Data as understood under EU GDPR and UK Data Protection Laws, as for example (a) identification data (name, first name, email address, mailing address, contact number, company details, position within company); (b) information about your connection and device capability in connection and interaction with our Site; (c) electronic identification data (as for example internet protocol address and cookies); (d) your user profile (e) member registration data (including relevant company information). All information of the nature specified in (a) to (e) shall be known as "**Personal Data**".

Purpose of the collection of Personal Data

The Personal Data collected will be used in order to enable Spark to fulfil its mission as Service Provider. The legal basis of this processing results from the execution of the contractual documentation applicable to the Services subscribed by the Members.

The purposes for which Spark collect, hold and use Personal Data are :

- To register a member to use the Services as defined in Terms of Use
- To provide personalised and specific information facilitated through our Services as defined in Terms of Use
- To respond to an individual's request
- To operate, evaluate and improve our Services as defined in the Terms of Use
- To maintain contact with members
- To keep members and other contacts informed of the Services (as defined in the Terms of Use), updates to the Services, industry developments, and to notify them of relevant Service offerings



- For general management and reporting purposes, such as invoicing and account management as necessary

If you choose not to provide us with Personal Data, we will be unable to do the above functions.

We collect, hold and use Personal Data about individuals to market our Services, including by email. However, individuals always have the opportunity to elect not to receive further marketing information from us by writing to Spark Commodities at info@sparkcommodities.com.

Recipients of the Personal Data

The Personal Data collected are aimed at operating our services. Spark shall be considered as the main recipient of the collected Personal Data.

Disclosure of Personal Data

We are committed to protecting your privacy. We do not sell, rent, distribute or otherwise make Personal Data commercially available to any third party, except as described in this Privacy Policy. We will not disclose your Personal Data to third parties unless you consent to such disclosure or in circumstances where such disclosure is required or authorised by law or to enforce our Terms of Use, to respond to claims from third parties, to protect the safety, interests, rights or property of ours or others or as permitted under this Privacy Policy.

You agree that we may disclose your Personal Data to third parties under any of the following circumstances:

- When we have your consent to disclose the Personal Data
- When we disclose your Personal Data in accordance with this Privacy Policy
- We need to disclose your Personal Data to provide the Services that you have requested
- We need to disclose the Personal Data to third parties who on behalf of us provide Services to you or assist us in maintaining the quality and efficiency of our Services and our business operations (we will only provide such third parties the relevant information required for the provision of the Services, and the third parties are prohibited from keeping, using or disclosing such Personal Data for any unauthorised purpose)
- Such disclosure is otherwise required or permitted by law

All Spark application and database servers are physically managed by GCP (Google Cloud Platform) in secure data centres. Spark database servers are managed in Los Angeles, California. Spark applications are managed in Los Angeles, California, Singapore and St Ghislain, Belgium, where we process your data.

In individual cases, your Personal Data may also be processed in third countries, which may not offer the same level of protection as the places where you first provided the data. However, we will only transfer your personal data from contractors to companies in third countries if we have agreed with the relevant contractors a standard data protection clause adopted by the European Commission as adequate protection for your personal data.



Transfer of Personal Data

Spark Commodities may exchange or store Personal Data with third party service providers who may be located overseas to process or back-up our information or to provide certain services to us. While these parties will be subject to confidentiality and although Spark Commodities shall endeavour to ensure the maintenance of the same Personal Data standards, they may not be required to comply with the data protection laws as the country in which you initially provided the Personal Data may have different disclosure requirements under their local laws. Although information is encrypted where possible and Spark Commodities will take reasonable efforts to protect your information, when you agree to this Privacy Policy you acknowledge that Spark Commodities will not be responsible for any overseas third party and you also acknowledge and agree to overseas storage, processing and transfer of your Personal Data.

You also acknowledge and agree that the information that you provide may be stored or processed in, or transferred to, servers of our affiliates and of our service providers.

While we will take reasonable care in preventing the loss, misuse or alteration of your Personal Data, you acknowledge that the security of data transmitted over the Internet cannot be guaranteed.

We may sell or buy subsidiaries or business units. In such transactions as well as in the event that all or substantially all of our assets are acquired by a third party, your Personal Data will generally be one of the transferred business assets. We reserve the right to include your Personal Data, collected as an asset, in any such transfer to a third party.

Personal Data Management

Spark Commodities takes reasonable steps to protect Personal Data it holds from misuse, interference and loss and from unauthorised access, modification or disclosure.

Personal Data will be stored for as long as the user has access to the Service. It will be retained for an additional 24 months in case it is required by either party, or in accordance with prevailing regulations. Where Personal Information is no longer required for the purpose for which it was collected, reasonable steps will be taken to destroy or permanently de-identify the information, unless we are legally required to retain it. Unsolicited Personal Data received from third parties that does not serve an appropriate purpose will be destroyed.

Any Personal Data breach shall be reported to the supervisory authority within 72 hours.

Your Rights

Any individual has the right to obtain transparent information, to oppose, access, withdraw consent and rectify any data which is relevant. If you wish to exercise any of these rights, please contact info@sparkcommodities.com. Any processing of data must be brought to the attention of the individual via email at the time of first communication.

Any complaint may be addressed to the Personal Data Protection Commission of Singapore and/or the Information Commissioner's Office via their respective websites.

Cookies

On your first visit to this site you were asked (by a notification banner) to accept our use of cookies and similar technologies and we'd like to explain how we use these technologies.



Like many websites, we use cookies for a variety of purposes. These technologies collect information about your device hardware and interactions with our site.

This information helps us to continuously improve our site's content and functionality by analysing where, on which types of devices and how our site is used, how many visitors we receive, and where they click through to the site from; and remember you in case you re-visit our site, so we will know if you have already been served with cookie banners, surveys, or (where site content is undergoing testing) which version of the content you were served.

To delete or stop cookies being placed on your computer, please check the help menu of your internet browser. Blocking cookies will reduce the functionality of this website.

Spark's full Cookie Policy can be found [here](#).

Links to other sites

Spark Commodities is not responsible for the privacy practices or the content of web sites that are linked on the Spark Commodities Site. Please refer to the Terms of Use.

Changes to Privacy Policy

Spark Commodities operates in an ever-changing business environment. Over time, aspects of our business may change as we respond to changing market conditions. This may require our policies to be reviewed and revised. We reserve the right to change this Privacy Policy at any time and notify you by posting an updated version of the Privacy Policy on the Site.

Acknowledgment

BY ACCESSING OR USING THE SITE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND CONSENT TO THE PRIVACY PRACTICES, AND TO THE USES AND DISCLOSURES OF INFORMATION WE OBTAIN ABOUT YOU, THAT ARE DESCRIBED IN THIS PRIVACY POLICY, AND YOU AGREE TO BE BOUND BY THE TERMS OF USE REFERENCED ABOVE.