

Privacy Policy

Last updated: 10 November 2025

This Privacy Policy explains how **NaviTrade Energy Ltd** ("NaviTrade", "we", "us", "our") collects, uses, shares and protects personal data when you visit our website, contact us, or interact with us via email or messaging services such as WhatsApp.

1) Who we are

Data Controller: NaviTrade Energy Ltd

167–169 Great Portland Street, 5th Floor, London, W1W 5PF, United Kingdom

Email: contact@navitradeenergy.com

Website: www.navitradeenergy.com

2) Scope

This Policy applies to our website and to our communications with prospective and existing business contacts, suppliers and clients (B2B context).

3) Personal data we collect

- **Inquiry & contact details:** first/last name, company, business email, phone number, role (supplier/receiver), selected product, free-text message.
- **Communications metadata:** dates/times, IP address (server logs), referrer/UTM parameters, and message headers.
- **Website usage (limited):** essential cookies for site operation; we currently do not use behavioural advertising cookies. If we add analytics later, this policy will be updated.

4) Sources

We receive data directly from you (forms, email, WhatsApp) and, where relevant, from your organisation or public business sources (e.g., corporate websites, LinkedIn) for B2B verification.

5) Purposes and legal bases (GDPR/UK-GDPR)

- **Responding to inquiries & providing quotes:** performance of a contract or steps prior to entering a contract (Art. 6(1)(b)).
- **Business operations, supplier/buyer due diligence, fraud and compliance checks:** legitimate interests (Art. 6(1)(f)) and/or legal obligation (Art. 6(1)(c)).
- **Communications and relationship management:** legitimate interests (B2B relationship management).
- **Marketing (if any):** consent (Art. 6(1)(a)) or legitimate interests (B2B), with opt-out rights at any time.

6) Retention

- **Inquiry records:** typically up to 24 months from last interaction, unless required longer for legal/regulatory reasons.
- **Server logs & security events:** typically up to 12 months.
- We apply data minimisation and periodic reviews.

7) Sharing & recipients

We may share data with:

- **Service providers** (e.g., hosting, email/messaging providers, IT/security support) under contractual confidentiality and data processing terms.
- **Professional advisers and counterparties** as needed for transactions, compliance and dispute resolution.
- **Authorities** where required by law or to protect our rights, users, or the public.
- **Business transfers** (e.g., merger or acquisition) following appropriate safeguards.

We do **not** sell or "share" personal data for cross-context behavioural advertising.

8) International transfers

We operate internationally and may transfer data outside your country, including outside the UK/EU/EEA. Where required, we use appropriate safeguards (e.g., Standard Contractual Clauses, UK International Data Transfer Addendum) and implement technical and organisational measures.

9) Security

We maintain administrative, technical and physical safeguards appropriate to the nature of the data and risks, including access controls, encryption in transit, and logging/monitoring. No method of transmission or storage is fully secure; residual risk remains.

10) Your rights

Depending on your location, you may have rights to:

- access, rectification, erasure, restriction, objection (including to direct marketing), and portability (EU/UK GDPR);
- withdraw consent where processing is based on consent;
- lodge a complaint with a supervisory authority (e.g., UK ICO or your local EEA authority).

To exercise rights, contact: contact@navitradeenergy.com. We may request reasonable verification that you are the data subject.

11) California privacy notice (CPRA)

For California residents, you may have the right to request access, correction, deletion, to know categories/specific pieces of personal information, and to be free from discrimination for exercising rights. We do not sell or share personal information for cross-context behavioural advertising and do not use "sensitive personal information" for additional purposes. Submit requests at contact@navitradeenergy.com.

12) Cookies & similar technologies

We use essential cookies for site operation. If we add analytics or other non-essential cookies, we will provide appropriate notices and choices.

13) Children

Our services are intended for business professionals. We do not knowingly collect personal data from children under 16.

14) Changes to this Policy

We may update this Policy from time to time. Material changes will be posted on this page with a new "Last updated" date.

15) Contact

Questions or requests can be sent to contact@navitradeenergy.com.

Signed on behalf of NaviTrade Energy Ltd



Capt. Dimitrios I. Flokas

Founder & Chief Executive Officer / Director
NaviTrade Energy Ltd