

Privacy Policy

Effective date: 8 June 2026

1. Introduction

This Privacy Policy describes how Morena Energy ("Morena Energy", "we", "us", or "our") collects, uses, and discloses information about visitors to our website at morenaenergy.com (the "Website") and individuals who interact with us in the course of our business activities.

We are committed to protecting the privacy and security of personal information in accordance with applicable data protection laws, including the Nigeria Data Protection Act 2023 (NDPA), the Swiss Federal Act on Data Protection (FADP), and, where applicable, the European Union General Data Protection Regulation (GDPR) and the United Kingdom General Data Protection Regulation (UK GDPR).

2. Data Controller

The data controller responsible for personal data processed in connection with this Website and our business activities is:

Morena Energy

PC 32, Churchgate Street

Victoria Island, Lagos State, Nigeria

Email: privacy@morenaenergy.com

For data subjects in Switzerland and the European Economic Area, our Geneva office may also be contacted at geneva@morenaenergy.com.

3. Personal Information We Collect

We may collect the following categories of personal information.

Information you provide directly:

- Name and contact details (email, telephone number)
- Professional information (job title, company name, business address)
- Correspondence and communications you send to us
- Any other information you choose to share when contacting us through the Website or in the course of our business engagements

Information collected automatically:

- IP address and approximate geographic location
- Browser type and version
- Device type and operating system
- Pages visited, time spent on the Website, and referring URLs
- Cookies and similar tracking technologies (see our Cookie Policy)

4. How We Use Personal Information

We process personal information for the following purposes:

- Responding to enquiries submitted through the Website or by email
- Conducting and developing our business, including counterparty engagement, trading activities, and commercial communications
- Counterparty due diligence, including Know-Your-Customer (KYC), Anti-Money Laundering (AML), and sanctions screening
- Recruitment and processing of applications submitted to careers@morenaenergy.com
- Compliance with legal, regulatory, and contractual obligations
- Maintaining the security, integrity, and performance of the Website
- Analytics and improvement of our services

5. Legal Basis for Processing

Where applicable data protection law requires a legal basis for processing, we rely on one or more of the following:

- **Consent**, where you have provided it (and which you may withdraw at any time)
- **Performance of a contract** to which you are a party, or to take steps at your request prior to entering into a contract
- **Compliance with a legal obligation** to which we are subject
- **Legitimate interests** — including conducting our business, maintaining counterparty relationships, and securing our Website — balanced against your interests, rights, and freedoms

6. Disclosure of Personal Information

We may share personal information with:

- Our affiliates and group entities
- Service providers acting on our behalf (for example, website hosting, analytics, and communications platforms)
- Banks, insurers, inspection agencies, and other counterparties in the course of executing transactions
- Professional advisers (lawyers, accountants, auditors) where required for legitimate business purposes
- Regulatory authorities, law enforcement, courts, or other competent authorities where required by law

We do not sell personal information.

7. International Transfers

Morena Energy operates from offices in Nigeria and Switzerland and engages with counterparties globally. Personal information may therefore be transferred to and processed in jurisdictions outside the country in which you are located, including jurisdictions that may not provide an equivalent level of data protection.

Where required by applicable law, we implement appropriate safeguards for such transfers, including standard contractual clauses or equivalent mechanisms recognised under applicable law.

8. Retention

We retain personal information for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory, accounting, or reporting requirements. Retention periods vary depending on the nature of the information and the purpose for which it is held.

9. Your Rights

Depending on the jurisdiction in which you are located, you may have the following rights in relation to your personal information:

- The right to **access** personal information we hold about you
- The right to **rectification** of inaccurate or incomplete personal information
- The right to **erasure** ("right to be forgotten") in certain circumstances
- The right to **restrict** or **object to** processing
- The right to **data portability**
- The right to **withdraw consent** where processing is based on consent
- The right to **lodge a complaint** with a supervisory authority — in Nigeria, the Nigeria Data Protection Commission; in Switzerland, the Federal Data Protection and Information Commissioner; in the European Union, your national data protection authority

To exercise any of these rights, please contact us at privacy@morenaenergy.com.

10. Security

We maintain appropriate technical and organisational measures to protect personal information against unauthorised or unlawful processing, accidental loss, destruction, or damage. No method of transmission over the internet or method of electronic storage is fully secure, however, and we cannot guarantee absolute security.

11. Children

The Website is not directed to individuals under the age of 18. We do not knowingly collect personal information from minors. If you believe we have inadvertently collected such information, please contact us at privacy@morenaenergy.com and we will take appropriate steps to delete it.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The effective date at the top of this policy will be updated to reflect the most recent revision. Material changes will be communicated through the Website or by other appropriate means.

13. Contact

For any questions about this Privacy Policy or our handling of personal information, please contact:

Morena Energy

PC 32, Churchgate Street

Victoria Island, Lagos State, Nigeria

Email: privacy@morenaenergy.com