

Privacy Policy

This privacy policy explains the manner in which Alufer Mining Limited (“Alufer” or “we “or “us” or “our”) collects, uses and protects your personal information and informs you about your privacy rights and the protections provided to you by law.

We are committed to ensuring that your privacy is protected.

Personal Data means any information that identifies, or could reasonably be used to identify, a natural person, either on its own or together with other information.

Changes to this Privacy Policy

Alufer may change this policy from time to time by updating this page. You should check this page from time to time to see any updates or any changes to our privacy policy. This policy is effective from 25th May 2018. By visiting www.alufermining.com you are accepting and consenting to the practices described in this policy.

Controller

Alufer is the controller and is legally responsible for your Personal Data. We have appointed a data privacy manager who is responsible for monitoring issues relating to this privacy notice. If you have any queries regarding this privacy notice, including any requests to exercise your legal rights, please contact:

The Data Privacy Manager

Alufer Mining Limited

Trafalgar Court

Admiral Park

St Peter Port

Guernsey

GY1 3EL

GDPR@alufermining.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would,

however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Data collected by us

If you have had contact with us, for example through email, business cards or meeting one of our representatives, we may store limited amounts of personal information relating to you, such as your name, job title, employer organisation and contact details.

We may also collect the following information:

- name and job title
- contact information including email address
- technical data and usage data
- demographic information such as postcode, preferences and interests
- marketing and communications data
- other information relevant to customer requirements

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to 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 product or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Purposes for which we gather information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

We mostly process Personal Data on the lawful basis of our legitimate interest (as described below) but in doing so we may not override your interests or fundamental rights and

freedoms. We may also however process Personal Data where we have your consent to do so or where we need the personal information to perform a contract with you.

We require this information to operate and promote our business and understand your needs as well as to provide you with a better service, and in particular for the following reasons:

- for internal record keeping.
- for maintaining and recording of contacts
- for improving our products and services.
- for compliance with applicable laws and regulations

We may periodically send marketing and promotional emails about new products and services, recent transactions, business developments, market conditions or other information which we think you may find interesting using the email address which you have provided.

From time to time, we may also use your information to contact you for market research or to conduct surveys to improve or promote our services. We may contact you by email, phone, fax or mail.

We may also use the information to customise the website according to your interests.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at any time.

Sharing of Data

We may transfer your data to group companies and affiliates, business partners, service providers who provide IT and system administration services and professional advisers including lawyers, bankers, financial advisers, auditors and insurers.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your

Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

As an international group with operations and business partners and service providers across the world, we may transfer your personal data outside of the European Economic Area. We will ensure that a similar degree of protection is afforded to your data in such cases.

Data Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, the transmission of information through the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk and we cannot accept any liability for the loss, theft or misuse of the personal information which you have registered on our website if there is a security breach.

Data Retention

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data

In any situation we will generally not keep your Personal Data for longer than 10 years.

Your Legal Rights

Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Data:

Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your

information unlawfully or where we are required to erase your Personal Data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Cookie Policy

A cookie is a small file which asks permission to be placed on your computer's hard drive. If you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We

only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may however prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to and from other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement but have their own privacy policies and we do not accept any responsibility or liability for these policies. You should exercise caution and look at the privacy statement applicable to the website in question.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.