

Privacy statement

This privacy statement describes the processing of personal data at Finnish Minerals Group and its wholly owned subsidiaries ("Finnish Minerals Group", "we" or "us"). The privacy statement explains which personal data Finnish Minerals Group collects, uses or discloses, the purposes for processing personal data and the rights of the data subjects.

We process your personal data in a responsible manner. This privacy statement contains important information on how we use your personal data. If you want to know how we use cookies, read the cookie policy for our website.

Changes to the privacy statement

We review this privacy statement and our personal data processing policy on a regular basis to ensure that the statement and process are up-to-date and comply with the applicable data protection laws and regulations.

Finnish Minerals Group may make changes to this privacy statement. The updated privacy statement will be published on the company's website. We recommend that you review this privacy statement from time to time.

Controller and contact person

Finnish Minerals Group (Business ID 2674050-9), P.O. Box 800, 00101 Helsinki, Finland acts as the data controller for itself and on behalf of its wholly owned subsidiaries.

The contact person for the filing system is Emil Viitala, firstname.lastname@mineralsgroup.fi.

Any requests for the exercise of data subject rights, questions about the privacy statement and other inquiries about the processing of personal data should be sent to the above contact person's email address. You can also send your request/inquiry by post to the above postal address.

Whose data do we process?

Finnish Minerals Group processes the personal data of the following groups of people and entities and of their representatives and contact persons: commercial entities (such as current or potential investors, financiers, advisors, industrial partners, suppliers and service providers, as well as customers), organisations, research organisations, the media, the authorities, and users who visit our website and other digital service platforms. Please note that where links to third party websites or services are provided on our website, this privacy statement does not apply to those websites and services and Finnish Minerals Group is not responsible for how the third parties process your personal data.



Origin of personal data

The data content of our filing system comes from public websites and the data subjects themselves, or it is data provided to us in connection with a business or other transaction between us and the organisation represented by the data subject. We also collect personal data by automated and electronic means, including the use of cookies. Personal data are also collected from other legitimate sources, such as public or commercial registers of companies and businesses, the authorities and other similar public or commercial registers.

Purpose and legal basis for processing personal data

We will use your personal data in the following ways and for the following purposes:

- + To establish or maintain relationships with suppliers or customers for the procurement of services and materials and other operations of Finnish Minerals Group, as well as to establish and maintain relationships with investors and partners.

 Legal basis for processing: Contract
- + To provide information, communicate with various stakeholders and conduct research. **Legal basis for processing:** Legitimate interest: For the above purposes, we will process the personal data of persons whose position and status in society, business life or public administration has been deemed essential for Finnish Minerals Group or is otherwise associated with the persons' work or positions of trust.
- + To provide you with information that you have requested (e.g. newsletters and bulletins). **Legal basis for processing:** Consent we will only use your personal data for this purpose if you have asked us to do so. You can withdraw your consent at any time.
- + To provide you with better ways of accessing information on this website.

 Legal basis for processing: Legitimate interest we will use your personal data to provide the best user experience to you and other users of our website.
- + To process and evaluate your job application. **Legal basis for processing:** Legitimate interest we use your personal data to evaluate your job application, and to keep you updated throughout the application process.
- + To maintain our website and analyse the web traffic to and from the site.

 Legal basis for processing: Consent we will only use your personal data for this purpose if you have given your consent to the use of cookies. You can withdraw your consent at any time. Read more about cookies.
- + To maintain information security and physical security of the facilities.

 Legal basis for processing: Legitimate interest. We may process the data from technical controls for data security and access control purposes in order to protect the health and safety of people and the company's business data and assets.



+ To fulfil the obligations that guide our decisions and actions

Legal basis for processing: Compliance with a statutory obligation, such as the duty to report, the monitoring of sanctions and other compliance monitoring, the requirements of good governance and the share and shareholder registers (including participation in general meetings).

Which data do we collect?

Based on the above purposes of use, we may collect the following information about:

- + Basic information, such as name, email address, phone number, name of company or entity, job title, contact information of company or entity
- + Billing information and credit score, if required for a contractual relationship or partnership
- + Customer and other surveys and the communication of feedback
- + IP address (the unique identification number attributed to your computer or other device)
- + Information that you provide to us when you submit a job application, in which case we recommend that you review <u>our recruiting privacy policy</u>.

Do we disclose your data to third parties?

We may disclose your user data to our partners and subcontractors, such as the providers of IT and other services who store and maintain our data, as well as to any other professional service providers. The communication servers of the partners and subcontractors of Finnish Minerals Group are located in the EU. We do not transfer personal data to countries outside the EU.

Personal data may only be disclosed to business partners who have agreed to fulfil the confidentiality and data processing obligations and who comply with the applicable data protection laws, our data protection and information security requirements and the provisions of binding service contracts.

How long do we keep your data?

We will retain your data for as long as it is necessary for its intended use or for as long as it is required by the applicable laws and regulations. The applicable retention period is determined on the basis of the amount, confidentiality and intended use of the data, as well as the time limits related to the exercise of data protection rights.

Your rights

It is your right as a data subject to:

1. **Ask us to provide a copy of the data** we have about you, and details about how we process you personal data;



- 2. Ask us to rectify any inaccuracies in your personal data;
- 3. Ask us to present your personal data in a structured, commonly used and machine-readable format, if we process your data by automated means and with your consent. You can also ask us to disclose your personal data directly to a third party in the above format, and if it is technically feasible, we will do so; and
- 4. Ask us to erase your personal data or restrict our use of it (for example, if your preferences change or you want us to stop sending you the information you requested).
- 5. **Object to the processing of your personal data** when we are processing it on the basis of our legitimate interest; in such a case, we will stop processing the data, unless we can demonstrate compelling legitimate grounds for the processing.

If you are not satisfied with how we have processed your personal data, you have the right to lodge a complaint with your local supervisory authority to the Office of the Data Protection Ombudsman of Finland

Here's how you can contact us

Please contact us if you would like to exercise your rights as a data subject or if you have any questions about how we use your data (the contact information is provided above).

Priciples of personal data protection

Finnish Minerals Group only allows personal data to be processed by staff members who have been authorised and trained to perform data processing. The servers and data connections we use are protected by firewalls and other network security software and tools. Data that are handled manually are kept in locked storage and can only be accessed by authorised persons. Access control systems are used in the premises of Finnish Minerals Group and its service providers. The parties providing information system services to Finnish Minerals Group have agreed to maintain and uphold high quality data security and perform the necessary updating.

This privacy statement was last updated in October 2022.