

## **PRIVACY POLICY ATLANTIC COPPER, S.L.U.**

The purpose of this present privacy policy (hereinafter, the "**Privacy Policy**") is to comply with the duty of transparency in the processing of your personal data, allowing users of ATLANTIC COPPER, S.L.U. (hereinafter, "**AC**") [www.atlantic-copper.es/en](http://www.atlantic-copper.es/en), and AC's social networks (hereinafter, jointly, the "**Website**"), as well as to people who have contacted AC by telephone through AC's Internal Reporting Channel and have provided their personal data, consult the details of the different personal data processing that may be carried out as a consequence of your access and use of it.

### **1 IDENTIFICATION**

- **Data Controller:** ATLANTIC COPPER, S.L.U. (hereinafter, "**AC**")
- **VAT:** B-79110482
- **Registered Office:** Avda. Francisco Montenegro s/n, 21001 Huelva
- **Registered in the Mercantile Registry of Huelva** in Volume 536, Book 0, Folio 60, Page H-6003 (H), Inscription 128<sup>a</sup>.
- **Data Protection Officer (DPO):** LOPD\_AC@FMI.COM

### **2 INFORMATION**

By reading this Privacy Policy, you have been duly informed about the processing by AC of the personal data according to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and Organic Law 3/2018, of 5 December, de *Protección de Datos Personales y garantía de los derechos digitales*.

### **3 NEED TO PROVIDE PERSONAL DATA**

By accessing the Website your personal data will not be processed nor will you be obliged to provide any personal information, except as provided in the Cookies Policy. However, the use of some services or functionalities of the Website requires that you provide certain personal data, as indicated in the corresponding form, and implies its treatment by AC for the purposes and under the legal basis indicated below. Your refusal to provide your personal data implies the impossibility of processing your requests.

Regarding the use of the Internal Reporting Channel, we will process the personal data that you voluntarily provide.

### **4 RESPONSIBILITY OF THE DATA HOLDER**

As personal data holder, you will be responsible for ensuring that the data you provide through the Website and the Internal Reporting Channel are true, accurate, complete and up-to-date. For these purposes, you will be responsible for the veracity of all the data you communicate.

Regarding the personal data communicated through the Website you must keep the information provided duly updated, in such a way that it corresponds to your current situation.

Likewise, you will be responsible for the false or inaccurate information that you provide and for any damages, direct or indirect, that this may cause to AC or to any third parties.

## **5 PURPOSES OF THE PROCESSING OF YOUR PERSONAL DATA**

Personal data provided will be processed by AC for the following purposes:

- Solving inquiries, managing suggestions and resolving complaints that you have reported to AC.
- Assessing and managing your job application in the cases you send your Curriculum Vitae.
- Periodically send you, even by electronic means, commercial communications related to products, services, promotions, events or news that may be of your interest, if you consent by clicking the checkbox, or facilitating your data through the “promotional” form.
- Sending commercial communications through the AC profiles in the Social Networks, in case you become a friend or follower of the AC profile in the Social Networks.
- Managing registration to events. You are informed that AC could take photographs and videos of you during the events organized by AC in order to promote the company's activities. Should you not want your data to be processed for the aforementioned purposes, please, during the events, do not expose to the photographic or audiovisual displays.
- Be able to contact you and/or for the purpose of relationship management by AC.
- Allowing the development, fulfillment and control of the agreed contractual relationship.
- Manage reports submitted through the Internal Reporting Channel.

## **6 LAWFULNESS OF THE DATA PROCESSING**

Your data will be processed on the legal basis of a legitimate interest of AC, fulfilment of a contractual relationship and/or your consent, which you can withdraw at any time. Withdrawal of your consent shall not affect the lawfulness of any processing carried out before such withdrawal. Consent for a relevant purpose may be withdrawn, without withdrawing consent for the remaining purposes.

The lawful basis that legitimates the processing of the data communicated through the Internal Reporting Channel is to comply with the provisions of article 30 of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.

## **7 CATEGORIES OF DATA PROCESSED**

The request and/or query made to AC requires that you provide certain personal data, as indicated in the corresponding forms. In each form you will be indicated which are the required fields. The refusal to provide these data implies the impossibility of processing the requests or inquiries made.

As a general rule, the categories of data to be processed will be the following:

- Identifying data, such as name, surname.
- Contact information, such as your email address.
- Any information that you voluntarily provide us when using our forms or during a telephone conversation, including sensitive data provided which are essential for carrying out investigations relating to the Internal Reporting Channel.

In addition, other data may be necessary, which will be requested on a case by case basis.

In the event that you submit your CV for AC to evaluate your application, the following categories of personal data may also be processed:

- Employment details data.
- Academic and professional data.

If you attend events organized by AC, photographs or videos of the interested party may also be processed.

## **8 COMMERCIAL AND PROMOTIONAL COMMUNICATIONS**

One of the purposes for which we treat data provided by the interested parties is to send them, from AC, electronic communications with information related to news or activities related to our entity.

Whenever such electronic communication takes place, it will be directed exclusively to data subjects who have previously authorized the receipt of the same, and in the cases of AC clients and suppliers, they will be addressed to the those interested parties who have not opposed their sending, pursuant to Law 34/2002, of July 11, 2002, on Information Society Services and Electronic Commerce. Should you wish to stop receiving commercial communications from Atlantic Copper, S.L.U., you can request cancellation of the service by sending an e-mail to the following email address: LOPD\_AC@FMI.COM.

## **9 DATA RECIPIENTS**

The personal data that you can provide in the forms on the Website may be communicated, in certain cases, to the following categories of recipients:

- Should you have consented to or have not opposed the receipt of electronic communications (in accordance with the provisions of section 8 of this Privacy Policy), your data may be communicated to service providers for sending electronic communications.

- If you send your CV for AC to evaluate your application, your data may be communicated to recruitment service providers.
- The photographs and videos that have been taken during the events organized by AC or in which AC participates, may be published in press, magazines, brochures, AC Social Networks profiles, as well as the AC website, *Fundación Atlantic Copper* website y *Freeport McMoRan, Inc.* website, in order to promote and publicize AC activities. If you do not want their data to be communicated to the aforementioned companies, please, during the events, do not expose to the photographic or audiovisual displays.
- Access to the data provided in relation to the Internal Reporting Channel shall be limited to the person responsible for the system and to whoever manages it directly; the person responsible for human resources, when disciplinary measures may be taken; the legal services, if legal measures should be taken in relation to the facts described in the communication; and the data protection officer.  
Furthermore, if you choose to identify yourself as a reporter, AC will preserve your identity and guarantee the confidentiality of the data provided. Your identity may only be communicated to the judicial authority, the Public Prosecutor's Office or the competent administrative authority in the context of a criminal, disciplinary or punitive investigation.

## **10 INTERNATIONAL DATA TRANSFERS**

Data subjects' personal data may be transferred outside of the European Economic Area. Your personal data may be transferred to Freeport-Minerals Corporation, a Delaware corporation based in Phoenix, Arizona, USA, which forms part of FCX Group, for the purposes of management of the contractual relationship. Such international transfers have been regularized by the signature of the standard contractual clauses.

## **11 STORAGE PERIOD**

Your data will be stored for the relevant purposes for the period of time necessary for the purposes as long as you do not revoke the consents granted, if applicable, and, even later, they will be kept blocked, if necessary, until any legal actions derived have expired.

Personal data provided by sending your Curriculum Vitae through the “register your CV” form will be kept for one year from the date of the last update. After this period has elapsed, without having been updated, the data will be deleted, unless you indicate otherwise.

The data provided through the Internal Reporting Channel shall be kept for the time necessary to decide whether to initiate an investigation of the reported facts. In any case, after three months since the data were storage without any investigation having been initiated, the data shall be deleted from the Internal Reporting Channel, unless the purpose of their retention is to record the functioning of the system. Communications that have not been followed up may only be recorded in an anonymized form, without the obligation to block provided in article 32 of the Organic Law on Data Protection, 3/2018 of 5 December 2018, being applicable. In no case will we keep the data for a period of more than ten years.

## **12 YOUR RIGHTS.**

You can contact AC by sending an e-mail to the address [LOPD\\_AC@FMI.COM](mailto:LOPD_AC@FMI.COM) with the reference “Data Protection”, attaching a copy of your identity document, at any time and free of charge. You shall at all times be able:

- To obtain confirmation about whether your personal data is being processed by AC.
- To access your personal data.
- To rectify inaccurate or incomplete data.
- To request the erasure of your data when they are not anymore needed for the purposes they were collected.
- To restrict the processing of personal data whenever any of the conditions of the data protection regulations are met.
- To request for human intervention, express your point of view or dispute automatic decisions made by AC.
- To request the portability of your data.
- To withdraw consents granted.
- To file a complaint regarding the protection of your personal data with the Spanish Data Protection Agency at [www.aepd.es](http://www.aepd.es)

## **13 SECURITY MEASURES**

AC will process personal data at all times in a confidential manner, in accordance with any relevant regulations, by adopting the necessary technical and organizational measures in order to ensure the security of the data and to avoid its alteration, loss, unauthorized processing or access. For the adoption of such security measures, the state of the technology, the nature of the data processed and the risks involving any possible breaches, shall be taken into account.

## **14 UPDATE OF THE PRIVACY POLICY**

AC reserves the right to modify this Privacy Policy in order to adapt it to its needs or the legislative changes that may be appropriate. In these cases, AC will announce the changes introduced and publish them on this Website, so that you can easily access them at any time.