

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

**1 IDENTIFICATION**

- **Data Controller:** ATLANTIC COPPER, S.L.U. (hereinafter, “AC”)
- **VAT:** B-79110482
- **Registered Office:** Avda. Francisco Montenegro s/n, 21001 Huelva
- **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 repealing Directive 95/46/EC (General Data Protection Regulation).

**3 PURPOSES OF THE PROCESSING OF YOUR DATA AND STORAGE PERIOD**

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.

#### **4 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 Consent for a relevant purpose may be withdrawn, without withdrawing consent for the remaining purposes.

#### **5 STORAGE PERIOD**

Your data will be stored for the relevant purposes for the period of time necessary for the purposes and, even later, until any possible actions derived from such query have expired.

Personal data provided by sending your Curriculum Vitae through the “register your CV” form will be processed by AC for assessing and managing your job application and, where appropriate, carrying out the necessary actions for the selection and hiring of personnel. Unless you indicate otherwise, your personal data will be stored for a year after sending AC your resume. Therefore, it is your responsibility to keep such information updated, since it will be used to notify you of future vacancies that may be of your interest.

#### **6 COMMERCIAL AND PROMOTIONAL COMMUNICATIONS**

One of AC’s objectives of processing your personal data is to be able to send them electronic communications with information relating to AC’s activities, events, news, products, services, offers or any other commercial content. Whenever such an electronic communication takes place, it will be directed exclusively to customers and/or suppliers who have not previously objected to receiving them. 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](mailto:LOPD_AC@FMI.COM)

#### **7 DATA RECIPIENTS**

Your data may be transferred to Freeport-Minerals Corporation, under the laws of the State of Delaware, USA and with headquarters in Phoenix, Arizona, USA, belonging to the FCX Group, in order to carry out the provision of management services of the company. The international transfer is regularized since AC has authorization from the Spanish Data Protection Agency and FCX is self-certified to the “*Privacy Shield*”.

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.

## **8 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 his/her personal data.
- To rectify inaccurate or incomplete data.
- To request the erasure of his/her data.
- To restrict the processing of personal data whenever any of the conditions of the data protection regulations are met.
- To request the portability of your data.
- To withdraw his/her consent.
- To request for human intervention, express your point of view or dispute automatic decisions made by AC.
- 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)

These rights shall only be exercised where the requirements set forth in the current regulations are duly met.

## **9 SECURITY MEASURES**

AC shall 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.

**Last updated: May, 24th, 2018.**

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