

**Information on the processing of personal data  
for members of the board of directors, executive directors, key managers, proxies, shareholders, beneficial owners indicated by the Counterparty in the verification questionnaire for the purpose of examining the supply chain in the Elemental Capital Group**

<p><b>Who is the personal data controller?</b></p>	<p>In line with applicable data protection law, we inform you that the controller of your personal data is <b>Kat Metal Estonia Oü with its seat in with its registered office in Nõlva tn 9, 10416 Tallinn, Estonia</b> (hereinafter: Controller).</p> <p>The Controller can be contacted via:</p> <ol style="list-style-type: none"> <li>1. regular mail (by sending correspondence to the Controller's registered office address indicated above)</li> <li>2. e-mail address: <a href="mailto:info@katmetal.ee">info@katmetal.ee</a>.</li> </ol> <p>The Controller is responsible for the security of the personal data provided and for processing it in accordance with the law.</p>
<p><b>For what purpose and on what legal basis do we process personal data?</b></p>	<p>Your personal data may be used by the Controller in connection with the supply chain examination for compliance with, environmental, human rights and sustainability requirements, in accordance with the "Supply chain Management Policy at Elemental Group".</p> <p>The Controller processes personal data for the following purposes:</p> <ol style="list-style-type: none"> <li>1. Identification, assessment and mitigation of money laundering and terrorist financing risks and proper management of identified money laundering and terrorist financing risks.</li> <li>2. Prevention, detection and reporting of corporate social responsibility and sustainability risks.</li> <li>3. Detection and prevention of corruption.</li> <li>4. Contacting the counterparty's representatives or designated contact persons with regard to conducting a supply chain study in the Elemental Group.</li> <li>5. Investigating or defending against possible claims, related to conducting a supply chain study in the Elemental Group, or in connection with the need to prove certain facts that are material to the Controller in this regard.</li> </ol> <p>Provision of personal data is voluntary, but necessary to carry out the investigation of the supply chain in the Elemental Group, including verification of counterparties, analysis and evaluation of information for the initiation or continuation of cooperation, verification of the entity and individuals associated with it, to assess the risk of money laundering, eliminate or reduce identified risks and implement mitigating measures.</p> <p>Refusal to provide data may the inability to conduct a supply chain study and fulfill other purposes of the Controller indicated above.</p>
<p><b>Will the data be subject to profiling?</b></p>	<p>Your personal data will not be used to make decisions based solely on automated processing of personal data, including profiling.</p>
<p><b>How long will we use the acquired data?</b></p>	<p>Personal data will be used for the period necessary for the purposes indicated above. Depending on the legal basis, this will be respectively:</p> <ol style="list-style-type: none"> <li>1. the period of cooperation between the Controller and the counterparty,</li> </ol>

	<ol style="list-style-type: none"> <li>2. a period of 5 years from the end of the financial year in which the information and documents collected during the examination of contractors were gathered;</li> <li>3. the period of limitation of claims (the time limits for asserting claims under the contract are specified in detail in the Civil Code),</li> <li>4. the period until the final conclusion of the proceedings, if your data will constitute evidence in a proceeding under the law or the Controller became aware that they may constitute evidence in the proceeding.</li> </ol>
<p><b>What rights does the person whose data we process have?</b></p>	<p>You have the right to make a request regarding:</p> <ol style="list-style-type: none"> <li>1. access to data (including obtaining information on what data is processed by the Controller and to what extent, as well as obtaining a copy of the data),</li> <li>2. rectify data (i.e., correct it if the data processed by the Controller is incorrect or incomplete),</li> <li>3. deletion of data (if, for example, the data are no longer needed for the purposes for which they were collected or the Controller has no legal basis for processing the data),</li> <li>4. limitation of data processing (if, for example, you question the accuracy of the personal data used by the Controller, if the data are no longer needed by the Controller, but need to be processed because you are pursuing a claim),</li> <li>5. object to the processing of personal data, including profiling (if the personal data is processed on the basis of a legitimate interest of the Controller).</li> </ol> <p>In addition, you have the right to lodge a complaint to the competent supervisory authority – to the supervisory authority for the company handling the process of examining the supply chain in Elemental Capital Group (the President of the Office for Personal Data Protection, more information: <a href="https://uodo.gov.pl/en/681/1404">https://uodo.gov.pl/en/681/1404</a>) or to the concerned supervisory authority having jurisdiction over the establishment of the Counterparty (i.e. Data Protection Inspectorate (Andmekaitse Inspektsioon) Tatari 39, Tallinn 10134; for more information, see <a href="https://www.aki.ee">https://www.aki.ee</a>); – if you believe that the processing of your personal data violates the law.</p>
<p><b>To whom do we share data?</b></p>	<p>With all guarantees of data security, we may provide your data to entities authorized to receive them under applicable laws (e.g., police, courts, prosecutor's office) and to other controllers (e.g., notary offices or legal offices), including other Elemental Capital Group companies.</p>
<p><b>Do we carry out international data transfers?</b></p>	<p>The Controller is a part of Elemental Capital Group that operates and processes personal data globally. This may result in processing personal data in countries, whose data protection laws may differ from those applicable to the Controller. This may include transferring personal data to or accessing it from other jurisdictions. Where the Controller transfers personal data from inside the EEA to outside the EEA or in any other way engages in data transfers to the EEA, provisions of Regulation (EU) 2016/679 (EU GDPR) shall apply accordingly.</p> <p>In the case of data transfers governed by the EU GDPR, the transfer is carried out with an adequate degree of protection, primarily by:</p>

	<p>1. cooperation with entities that process personal data in countries outside the EEA for which the European Commission has determined that they provide an adequate level of protection (this includes US companies certified under the approved EU-US Data Protection Framework, such as Microsoft),</p> <p>and in the absence of the aforementioned decision of the European Commission:</p> <p>2. The use of standard contractual clauses in contracts with such companies,</p> <p>3. application of binding corporate rules approved by the relevant supervisory authority,</p> <p>4. application of the conditions set forth in Article 49 of the EU GDPR.</p> <p>The Controller shall ensure that any transfer of personal data is carried out under appropriate agreements, in a secure and controlled manner.</p> <p>In any of the cases described in paragraphs 2-4 above, you may request further information about the safeguards in place in this regard, obtain a copy of these safeguards and information about the place where they are made available.</p>
<p><b>How can you contact us on matters related to the protection of personal data?</b></p>	<p>In matters related to data protection, you can contact the Controller through:</p> <ol style="list-style-type: none"> <li>1. e-mail address: <a href="mailto:gdpr@elemental.biz">gdpr@elemental.biz</a>,</li> <li>2. of the Controller's mailing address indicated above.</li> </ol>
<p><b>Additional information for persons whose data has been obtained by the Controller as part of the Elemental Group's supply chain survey.</b></p>	<p>Personal data processed in connection with the contractor verification and assessment process was obtained directly from you (i.e., the person filling out the "ELEMENTAL CAPITAL GROUP CONTRACTOR SURVEY" form) or from entities cooperating with the Controller, covered by the contractor verification procedure.</p> <p>Personal data (including: first and last name, date of birth, country of birth, place of birth, citizenship, position in the organization - in the case of board members, executive directors, key managers, proxies; first and last name, date of birth, citizenship, country of birth, address of residence, share in the share capital / method of control - in the case of shareholders, stockholders, or beneficial owners) will be processed to the extent necessary to conduct a supply chain survey.</p>