



Privacy Policy

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NYRSTAR GROUP POLICY



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1. Introduction

Nyrstar recognizes the importance of having effective privacy protections in place and is committed to compliance with applicable data protection laws.

This policy describes global privacy principles and requirements for processing personal data and supplements national data privacy laws. This policy applies worldwide, and to all Nyrstar employees, regardless of their location. In the event of a conflict between national law and this policy, the relevant national law will always take precedence. In several countries there can be specific requirements and/or policies relating to privacy and data protection. Please contact your local legal representative for details about specific local requirements or our global privacy team (privacy@nyrstar.com).

2. General Data Protection and Privacy principles

Personal data will only be collected, used, transferred or otherwise processed by, or on behalf of, Nyrstar in a safe and professional manner, regardless whether the data is on paper, computer records or recorded by any other means. While collecting, using, transferring or otherwise processing personal data, Nyrstar and its employees will, in addition to local legal requirements, have to adhere to the following principles of data protection:

2.1 Legitimate purpose

Personal data can only be used, transferred or processed for a legitimate purpose, that was clearly defined at the time of collection. Personal data shall not be further used or processed in any manner incompatible with that purpose and may not be collected and stored for potential future use, unless allowed by local law. Legitimate purposes include the effective management of employment matters (such as payroll management, performance management, recruitment, time registration, absence and illnesses administration), health/safety and security issues (such as site access control, medical follow up or health related issues) and fulfilling contractual, legal or regulatory obligations (such as cooperating with law enforcement/regulatory inspections).

2.2 Individuals' rights

Personal data will be collected, used, transferred or otherwise processed fairly and lawfully. During the collection, use, transfer or otherwise processing of personal data, the rights of the individual relating to personal data must be protected. Nyrstar will respect, and comply with, all rights that individuals have under local applicable legislation including, but not limited to, the right of access, the right for individuals to have personal data erased (the right to be forgotten) and the right to rectification. However, in some countries these rights are not absolute; please refer to your local legal representative for details about locally applicable rights.

3. Nyrstar's obligations

The personal data that Nyrstar collects in the context of the legitimate purposes set out above shall be treated with due care. Nyrstar has classified personal data as “confidential”. Within Nyrstar, the access rights to personal data are restricted in such a way that they can only be accessed, collected, used, transferred or otherwise processed if this is necessary for the performance of certain tasks. Nyrstar employees who have such access rights (for instance HR, Legal or IT- department members) shall use extra care. Nyrstar will protect personal data in its possession, using technical, managerial and physical security measures against risk of loss or unauthorized access, destruction, use modification or disclosure. Nyrstar takes reasonable efforts to ensure that appropriate security measures are taken on a technical level (e.g. data encryption, IT security measures, passwords) and on a physical level (e.g. camera surveillance, access cards, secure lockable desks/lockers, gate entry controls). Nyrstar will only store personal data in databases maintained by third parties if there are sufficient data processing agreements and security safeguards in place.

4. Data retention

Personal data will be stored by Nyrstar as long as necessary for the purposes described in chapter 2.1 of this Policy or for any other purposes as may be specified in other policies. After such period, personal data will be destroyed or erased from our systems when it is no longer required. For guidance on how long certain data is likely to be kept before being destroyed, please refer to the **Retention Policy**.

5. Relevant contacts

In case of any questions or concerns relating to data protection, privacy and the application of this policy, please contact our Privacy Team (privacy@nyrstar.com).

6. Speak-Up helpline

The key to our culture of ethical conduct is honest, transparent communication. If you have any questions or become aware of, or suspect that, a breach of the Policy, has occurred or may occur in the future, you must report your concerns to your manager or to the compliance officer (compliance.officer@nyrstar.com).

Where a concern remains unresolved through the above local channels, or should you, for whatever reason and at any time, feel uncomfortable utilising the local channels for resolution of your concern, you can also raise, also anonymous, it via the ‘Speaking-Up Helpline. The helpline is managed by an external partner of Nyrstar, and can be reached 24/7 by phone and internet (www.nyrstar.ethicspoint.com).

When you raise a concern, we will maintain your confidentiality to the extent permitted by the local law in your country.