

MM Metal Recycling BV's Policy on using personal data of our Business Partners

This privacy policy is intended for those of you belonging to our current and prospect customers, suppliers, distributors and other business partners. We, MM Metal Recycling BV, take your privacy seriously. When we collect and use your personal data for various business purposes, we undertake to comply with applicable data protection laws including EU General Data Protection Regulation (the "GDPR") and Algemene Verordening Gegevensbescherming (Autoriteit Persoonsgegevens). Please note that data transmitted via the internet (e.g. via email communication) may be subject to security breaches. Complete protection of your data from third-party access is not possible. Below is our policy on how we collect, use and protect your personal data. You can obtain the latest version of this policy at the following link:

<https://www.mm-metal-recycling.com/files/mm-metal-recycling-bvs-policy-on-using-personal-data-of-our-business-partners-english.pdf>

■ PERSON IN CHARGE (controller) / DATA PROTECTION OFFICER

This privacy policy is issued by us, MM Metal Recycling BV. You can find more detailed information about MM Metal Recycling BV in the imprint of the above-mentioned website <https://www.mm-metal-recycling.com/en/about-us>. When we collect and use your personal data, we are the data controllers in the meaning of GDPR and are responsible for protecting your rights with personal data.

We have appointed a data protection officer (DPO) for the purpose of privacy and data protection, whom you can contact by the following e-mail address: dpo@mm-metal-recycling.com.

■ CATEGORIES OF PERSONAL DATA, PURPOSE AND LAWFUL BASIS (why and on what lawful ground we use your personal data)

We collect and use the following categories of your personal data:

- basic business contact information (name, company, position, email, phone, office address, etc.);
- video image (e.g. Microsoft Teams Meeting);
- user account data and usage history on our websites or online services;
- access records to our buildings and facilities;
- records of business communication in connection with our business operation (email logs, meeting logs, reports, audit interviews, event photos, etc.);

We use your personal data for the following purposes on the lawful basis that it is necessary for the purposes of our legitimate interests, i.e. running our business efficiently and effectively.

- Managing business contact data;
- Conduct Web meetings (e.g. Microsoft Teams Meeting);
- Sales and delivery of products and services;
- Procurement of materials and services;
- Providing technical support, training and seminars;
- Providing information on new products, services, case studies, etc.;

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- Receiving feedback for quality control;
 - Organizing business and/or technical events;
 - Auditing of suppliers;
 - Facilitating any other business communication; and
 - Controlling access to our physical facilities and computer/network resources.

■ SENSITIVE PERSONAL DATA

Where we collect and use sensitive categories of your personal data as defined in Articles 9 and 10 of the GDPR, we will obtain your prior and explicit consent. You may withdraw your consent at any time with effect for the future. An informal e-mail with this request is sufficient. The data processed before we receive your request may still be processed lawfully. Excepted from this consent is data where we are obliged to collect and use in order to fulfil our legal obligations or to protect vital interests of you or other persons in emergencies.

■ RETENTION (how long we retain your personal data)

We will retain your personal data as long as we have business relation with the company or any other entity you belong to at the time when we collect your personal data. Thereafter we keep them as may be required by applicable laws related to audit or tax issues or until we receive your objection to our retaining your personal data.

If you have given your consent to the processing, we will retain your personal data until you withdraw your consent to the processing (but no longer than 12 months if your account has been inactive), unless other legal provisions require us to retain the data for a longer period. If you do not withdraw your consent, we will delete your personal registration data as soon as your account has been inactive for 12 months.

■ DISCLOSURE (who we share your personal data with)

We disclose certain categories of your personal data in so far as may be necessary for the purposes above to the following entities:

- to other Mitsubishi Materials group companies as may be necessary for business purposes, e.g. expand business activities;
- where we provide you with user accounts for our computer/network services and resources, to Mitsubishi Materials Corporation, Tokyo (MMC), which provides us with such services and resources;
- competent public authorities to which we are obliged to disclose your personal data as required by applicable laws; and
- our service providers including those providing us with cloud computing, electronic mail or other application, business travel arrangement, courier, receptionist, conference/event arrangement, etc.

where such service providers are “data processors” in the meaning of GDPR, we make sure that such data processors have in place appropriate data protection measures by virtue of data processing contracts signed between such processors and us in compliance with Article 28 of GDPR.

■ **JOINT CONTROLLERS**

If, when processing your personal data, there is another controller in addition to us, MM Metal Recycling BV, with whom we jointly determine the purposes and means of the processing, so that there is joint responsibility in accordance with Article 26 of the GDPR, the terms of the joint responsibility will be regulated.

■ **TRANSFER TO NON-EU COUNTRIES**

We may disclose your personal data to other Mitsubishi Materials group companies that are located in countries outside of the European Economic Area, where data protection law with a level of privacy and data protection equivalent to that of GDPR is not in force. In cases where such data transfer happens, we protect your personal data by virtue of data transfer agreements with such data recipients pursuant to Article 46 of the GDPR, which impose on such recipients contractual obligations to ensure adequate level of data protection equivalent to those laid down by GDPR.

■ **YOUR LEGAL RIGHTS**

Provided that certain conditions are met, you have legal rights to request from us the following:

- Access to your personal data and to certain supplementary information covered by this notice;
- Correction of your personal data if inaccurate or incomplete;
- Erasure of your personal data in certain circumstances;
- Suspension of using your personal data in certain circumstances;
- Stopping processing your personal data in certain circumstances; and
- Obtaining your personal data in a structured, commonly used, and computer-readable format.

If you wish to exercise any of your rights or have further questions about data protection, please contact us or our DPO, whose e-mail address can be found in the below abstract "INQUIRY".

■ **WEBSITE**

If you visit our website, please note that there is a separated privacy statement available, explaining about the processing of your personal data during and / or after the visit of the website.

<https://cdn.cookiecode.nl/privacy/mm-metal-recycling.com/en/pdf>

■ **COMPLAINT**

You can lodge complaints about our way of processing your personal data with data protection supervisory authorities. If there has been a breach of data protection legislation, the person affected may file a complaint with the competent regulatory authorities. The competent regulatory authority for matters related to data protection legislation is the data protection officer of the Autoriteit Persoonsgegevens in The Netherlands. A list of data protection officers and their contact details can be found at the following link:

<https://autoriteitpersoonsgegevens.nl/nl>

■ INQUIRY

For further information and inquiry, please contact:

Person in charge:

MM Metal Recycling BV
Kilojoule 2
4791 PE Klundert
E-mail: generalaffairs@mm-metal-recycling.com

Data protection officer:

[E-mail: dpo@mm-metal-recycling.com](mailto:dpo@mm-metal-recycling.com)

The responsible body is the natural or legal person, which alone or jointly with others decides on the purposes and means of processing personal data (e.g. names, e-mail addresses, etc.).

This procedure includes the English translation of the “MM Metal Recycling BV's beleid inzake het gebruik van persoonlijke gegevens van onze zakenpartners” (version Rev. 0.1, 01-04-2023). In case of difference between the Dutch and English texts, the Dutch text takes precedence over the English text.