



## **Privacy Policy**

May 2018

 <b>Brazilian Nickel</b>		<b>Privacy Policy</b>	
<b>Doc ID</b> 20180518-BRN-PrivacyPol	<b>Issue Date</b> 18 05 2018	<b>Revision Date &amp; No</b> Rev 0	<b>Page No</b> 2 / 5

## 1 Summary

Brazilian Nickel (Company number 8512513) and its subsidiaries (“BRN”) appreciate the importance of its role in handling and storing your personal data. This Privacy Policy explains how BRN will manage the personal data which we may collect, use, store and disclose in the course of our business relationship.

BRN’s Privacy Policy has been drafted to comply with the requirements of the privacy legislation in the jurisdictions in which we operate, including but not limited to the EU’s General Data Protection Regulation (GDPR).

If you would like to contact us to discuss any aspect of this Policy, you can do so by sending a message to [info@brnickel.com](mailto:info@brnickel.com).

## 2 The legal basis for data collection and processing

We must have a valid lawful basis in order to process your personal data.

There are six available lawful bases for processing. Most lawful bases require that processing is ‘necessary’. If we can reasonably achieve the same purpose without processing your data, we would not have a lawful basis.

We will determine a lawful basis before we begin processing any of your data.

Furthermore, our privacy notices will include our lawful basis for processing as well as the purposes of the processing.

Therefore, BRN will:

- review the purposes of our processing activities, and select the most appropriate lawful basis (or bases) for each activity;
- check that the processing is necessary for the relevant purpose, and that we are satisfied that there is no other reasonable way to achieve that purpose;
- document our decision as to which lawful basis applies to help demonstrate our compliance; and
- include information about both the purposes of the processing and the lawful basis for the processing in our privacy notice.

## 3 How we collect and use personal data

We may collect and use your personal data:

- when it is necessary for the performance of a contract or for pre-contractual negotiation. We may also disclose your personal data to our business partners, suppliers and sub-contractors where necessary for us to do so;
- when we are required to do so by law;
- when we have your free and informed consent; or

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- when we have other legitimate interests that do not override your personal interests or rights.

We may also use your personal data in the following situations:

- where we need to protect your interests (or someone else's interests);
- where it is needed in the public interest;
- where you must provide personal data to us in relation to a contract where we may not be able to perform this agreement without such data;
- we may process your personal data to assist in the prevention of crime or to protect the vital interest of you or any other person;
- we may share your personal information with companies in our Group where this is in our legitimate interests, including for administration purposes.

Please note that, in some cases, a member of our Group may contact you in connection with a query that you have made.

#### 4 Principles of privacy and data protection

In processing your personal information, we will comply with data protection law and ensure your data is:

- processed fairly, lawfully and transparently;
- obtained for specified and lawful purposes, and processed only in relation to those purposes;
- collected and processed only to the degree necessary for the purpose;
- recorded accurately and, where necessary, kept up to date;
- not kept for longer than is necessary; and
- held securely and protected against accidental loss or unauthorized use, disclosure or processing.

#### 5 What information do we collect?

We collect information about you when you use our website or when you contact us.

This might include, for example, your e-mail address, name, occupation, company employing you and your country of residence.

We may also collect information about your computer or device, including, where available, your IP address, operating system and browser type, for system administration purposes.

We collect personal information about you so that we can contact you, so that you can receive the services which you have requested or for which you have subscribed and, if you agree, so that we can e-mail you information about us and our products and services which may be of interest to you.

**Comment [A1]:** AO: post IPO we need to add  
 We may also receive information about you from Brighter IR where you have subscribed to our news alert service

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We may also use this information to personalise or enhance your browser experience.

## 6 Opting Out

If you have requested information from us and subsequently change your mind, you can email us at [info@brnickel.com](mailto:info@brnickel.com) and we will make a note not to send you any more of this information.

## 7 Security of your personal information

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”), for example to Brazil. Your personal data may also be processed by our staff operating outside the EEA, e.g. in Brazil.

This jurisdiction may not have levels of protection for personal data considered appropriate by the European Union. Where your personal data is processed outside the EEA, we will take all reasonable steps to ensure that it is properly protected and will ensure that any transfer from the EEA is made in accordance with applicable law (including where appropriate by use of the EU model clauses). The EEA comprises the EU member states, Norway, Iceland and Liechtenstein.

At all times BRN will take such steps as are reasonable in the circumstances to protect your data from unauthorised access, unnecessary duplication, modification and disclosure or for uses not consistent with this policy. These measures include having appropriate policies in place, staff training, utilization of passwords and network wide security measures.

You should note that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Any transmission is at your own risk.

## 8 Your rights

You have the right to:

- be informed of the reasons why we collect your personal information;
- request a copy of your personal data from us;
- request correction or deletion of your personal information; and
- ask us to stop processing your information for direct marketing process.

Please note that there are some circumstances where we may be restrained by law from providing or correcting your information. Wherever possible we will advise you of the reasons we cannot comply with your request.

If you have any questions about this privacy policy or how we handle your personal data, please contact us on [info@brnickel.com](mailto:info@brnickel.com).

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You have the right to make a complaint at any time to a data protection authority including to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can find out more about your rights in relation to your personal data at [www.ico.org.uk](http://www.ico.org.uk) and other websites provided by data protection authorities.