

Privacy notice for stakeholders

Definitions:

In addition to the terms defined elsewhere in this Privacy notice (i.e. the “**Notice**”), the following terms, whether used in the singular or plural in this Notice, have the following meanings:

- “**Recipient**”: refers to the natural or legal person, public authority, service, or any other entity that receives communication of personal data, whether or not it is a third party.
- “**Personal data**” or “**personal information**”: refers to any information relating to an identified or identifiable natural person (i.e. the “data subject”); an “identifiable natural person” is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, identification number, location data, online identifier, or one or more specific elements unique to their physical, physiological, genetic, mental, economic, cultural, or social identity.
- “**Controller**”: refers to the natural or legal person, public authority, service, or other entity that determines the purposes and means of processing.
- “**Processor**”: refers to the natural or legal person, public authority, service, or other entity that processes personal data on behalf of the controller.
- “**Processing**”: refers to any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Preamble:

As part of our dialogue with stakeholders, Eramet SA (also referred to as “**Eramet**”, the “**Company**” or “**we**” or “**us**” in this Notice) may collect and process personal data concerning you.

In this regard, we apply the principles defined by the legal and regulatory provisions applicable to us in terms of personal data protection, particularly those of Regulation (EU) 2016/679 of April 27, 2016, on the protection of natural persons with regard to the processing of personal data (known as « **GDPR** ») or the French Law No. 78-17 of January 6, 1978, on Information Technology, Data Files, and Civil Liberties (known as « **the Data Protection Act** ») and its implementing decrees.

This Notice describes the information concerning you that the Company, as the data controller, processes and how it uses it.

If you have any questions regarding this Notice, you can contact our Data Protection Officer via the email address dpo@eramet.com.

Why do we use your data?

We collect and process your personal data to monitor, coordinate, and manage our relationships with external stakeholders as part of our communication, dialogue, and engagement activities.

These processes are carried out for the following purposes:

- **To understand the positions, expectations, and scope of action and/or influence of stakeholders,**
- **To build and maintain a dialogue between entities whose interests are represented and relevant stakeholders, and to develop communication and relevant messages for these stakeholders,**
- **To maintain our professional relationships, monitor our contacts, and sustain our expertise and experience,**
- **To manage requests for the exercise of rights by data subjects.**

The collection and processing of this data also allow us to comply with the requirements of the IRMA ([*Initiative for Responsible Mining Assurance*](#)), international reference for responsible mining.

How do we collect your data?

Your data may be collected by Eramet directly from you (as part of your exchanges or interactions with us) or indirectly from third parties.

These third parties may include:

- websites or publications of entities (institutions, organizations, administrations, etc.) to which you are affiliated with,
- newsletters or publications or through other publicly accessible information sources,
- professional databases or public service directories,
- in the press, on websites, or on social networks.

What types of data may be collected and processed?

As part of our stakeholder relationship management activities, we may collect and process the following categories of data:

- **Identification data:** Title, name, first name, gender, photograph, and, in situations where it is strictly necessary (e.g., security processes for site visits) and only in cases of reasonable doubt about the identity of the requester, additional information or a copy of an identity document.
- **Contact data:** Email address, phone number, postal address, depending on the information voluntarily provided by the data subjects.
- **Professional data:** Functions, mandates or positions held, affiliated organization, role or nature of the relationship with our organization, stakeholder category, as well as any data related to responsibilities exercised (e.g. expenses related to stakeholder interactions, processed solely to ensure compliance with internal policies governing gifts and invitations, size and measurements necessary for providing PPE).
- **Biographical data:** Information related to education (studies, degrees), professional or political career, family relationships (only to ensure compliance with conflicts of interest policies).
- **Data related to interests and areas of expertise:** Topics of expertise, topics addressed or preferred.
- **Data from public activities:** Positions taken, public statements, interventions, as well as links to social media accounts associated with professional or public activities.
- **Data related to exchanges with our organization:** Interactions, communications, or any other exchanges between you and our organization.
- **Additional data processed for compliance purposes:** Content and details of received requests, exchanges and responses, summaries of recent communications, interaction history, information related to the planning or progress of exchanges (such as scheduling appointments, dates and times, participation in meetings, exchanges or events), dietary preferences only if necessary, as well as free comment areas strictly limited to what is necessary.
- **Evaluation and analysis data:** Information related to the evaluation of a positioning, level of influence, or interest in a project or activity conducted by our Group.
- **Communication preferences:** Preferred language communication.
- **Sensitive or special categories of data:** In certain limited cases and only when strictly necessary for the purposes pursued, we may process data falling under special categories of data defined in Article 9 of the GDPR, such as data that may reveal ethnic origin, political opinions, religious or philosophical beliefs, data on health or trade union membership. The processing of such data can only occur if your explicit consent has been previously obtained, or if this information has been clearly made public by you.

On what legal basis can my data be collected and processed?

We process your personal data based on the consent you have provided, based on our legitimate interests or to comply with a legal or regulatory obligation.

How long are these data retained?

We retain your personal data in active storage until the end of the expertise activity of the concerned person on topics of interest to Eramet, and then, after the active storage period, we retain them as archives for up to 6 years from the last contact, subject to other retention periods that may apply if your personal data are processed for other purposes.

When a copy of an identity document is collected in this context, it is:

- immediately deleted when it has been provided by you but the request does not require the transmission of such an identity document;
- deleted immediately after verifying the identity of the person making the request when the situation requires such verification or retained as archives for 6 years for evidence purposes in certain exceptional cases where a risk in terms of ethics and compliance or strong litigation is identified.

Who are the recipients of your personal data?

Only authorized individuals within Eramet can access your personal data when such access is necessary for the performance of their duties or missions. External individuals to Eramet may also, in limited and specific circumstances, receive or have access to your personal data, namely the:

- services or entities responsible for control of Eramet (auditors, services or entities responsible for internal or external control procedures, authorized organizations to conduct audits, High Authority for Transparency in Public Life¹),
- legal, financial, accounting advisors, etc. of Eramet,
- partners of Eramet, including service providers and suppliers, current or potential, including technical providers or other participants involved in activities or missions for which access to personal data is necessary and/or justified. This category of recipients may include, for example, any application, software, or tool publisher used in our activities or any IT or maintenance provider for applications, software, and/or tools used by Eramet in which your personal data may be processed.

In this regard, Eramet has chosen to centralize its stakeholder data (including their personal data) in a dedicated software called Borealis. IRTH Solutions, the publisher of Borealis software, is a recipient of the data entered into Borealis software for purposes of the provision of support and/or maintenance of the software. All data in the software are hosted by Amazon Web Services (AWS) in France, in Paris. Regarding the data of host communities of our operations, other softwares are used: GX2 and its MyCority version, as well as WeSustain by the publisher Cority, Triskell by the publisher Triskell Software, and PowerBI by the publisher Microsoft.

Additionally, Eramet uses the Microsoft Office 365 suite to communicate with stakeholders and among recipients regarding stakeholders. The publisher Microsoft is therefore a recipient of the personal data of stakeholders.

Finally, for managing requests to exercise their rights by data subjects, Eramet uses the Adequacy software by the publisher of the same name.

Eramet may also be required to disclose your personal data in case of legitimate requests from public or authorized authorities, based on legal or regulatory provisions applicable to it. Your personal data may therefore be disclosed to any authorized authority, particularly in case of requisition from judicial, police, or administrative authorities. It is specified that the recipients mentioned above are not necessarily recipients of all your personal data, but only those necessary for the purpose involving such communication.

¹ The High Authority for Transparency in Public Life, as part of an audit, may request access to, for example, Eramet's internal reporting.

Does your processing involve automated decision-making, including profiling, producing legal effects or significantly affecting you?

No. No automated decision-making based solely on automated processing, nor any profiling producing legal effects concerning you or significantly affecting you in a similar way, is implemented as part of our processing.

To what extent do we use artificial intelligence to process your personal data?

The Borealis software uses a language model (LLM) to provide functionalities for drafting assistance, improving the quality of entered data, and generating summaries based on information recorded by users.

Similarly, Eramet uses generative artificial intelligence features integrated into the Microsoft 365 suite, which enable searching, analyzing, organizing, synthesizing, presenting, and producing content based on information that the company's employees are authorized to access.

At no time are your personal data used to train language models or reused for other purposes, neither by Eramet nor by its service providers.

Are your personal data transferred outside the European Economic Area?

Your personal data are preferably processed within the European Economic Area (EEA) and in the following countries benefiting from an adequacy decision issued by the European Commission under Article 45 of the GDPR: Canada, Argentina, and the United States of America (Data Privacy Framework for Microsoft and AWS).

In order to achieve the aforementioned purposes, some of your personal data may be transferred to third-party entities established in countries outside the EEA, e.g., Group subsidiaries or processors. These entities are involved in the aforementioned processing activities, etc., and do not benefit from an adequacy decision by the European Commission under Article 45 of the GDPR, such as Senegal, Gabon, Indonesia, China, Chile, and the United States of America (excluding the Data Privacy Framework).

When this is the case, these transfers will be legitimized by appropriate safeguards, as provided for in Article 46 of the GDPR.

What are your rights and how can you exercise them?

10.1. Under the conditions, modalities, and within the limits defined by legal and regulatory provisions regarding the protection of personal data, you have the following rights concerning the processing of personal data carried out by the Company:

- **Right of access:** You can obtain confirmation as to whether personal data concerning you is being processed or not, and if so, access said personal data, as well as certain information related to the processing of your personal data and the characteristics of such processing.
- **Right to rectification:** You can request the correction of your personal data that you consider incomplete or inaccurate.

- **Right to erasure:** You can, in certain cases provided by applicable provisions, request the erasure of your personal data (except, for example, if it is necessary for the execution of your contractual relationships with the Company, or if it is necessary for the Company to comply with its legal or regulatory obligations or to establish or exercise its rights).);
- **Right to restriction of processing:** You can request the restriction of the processing of your personal data, i.e., request in certain cases the marking of your personal data to limit its future processing.
- **Right to data portability:** You have the right, in certain cases and under certain conditions provided by applicable provisions, to request to receive the personal data concerning you that you have provided to us or, where technically feasible, to have it transferred to a third party in a machine-readable format (it being specified that this right to data portability applies only to processing based on the consent of the data subjects or the execution of contractual relationships, and provided that the data processing is carried out using automated means).
- **Right to withdraw your consent:** You can withdraw your consent if the processing is carried out based on your consent, without the withdrawal of such consent affecting the lawfulness of the processing based on consent carried out before its withdrawal.
- **Right to define directives regarding the retention, erasure, or communication of your personal data after your death:** In this regard, in the event of death that is brought to the Company's attention, your personal data will be deleted (except for the necessity of retention for a determined period due to our legal and regulatory obligations and/or legal prescription periods and/or mandatory retention periods mentioned above in Section 5), after possibly being communicated to a third party designated by you.
- Furthermore, you have, in certain cases and under certain conditions provided by applicable provisions, a **right to object** which allows you to object to the processing of your personal data for reasons related to your particular situation, it being specified that concerning prospecting operations, including profiling operations related to such prospecting, you have an absolute right to object, which can be exercised at any time, without having to provide a reason or justification.

10.2. These rights can be exercised with the Company in writing at the following email address: **dpo@eramet.com** or (ii) by postal mail at the following address: ERAMET SA, Attention: Group DPO, 10 boulevard de Grenelle 75015 PARIS (FRANCE).

Upon receipt of such a request, it will be responded to as soon as possible and in any case within a maximum period of one month from the receipt of the request. If necessary, this period may be extended by two months, taking into account the complexity and number of requests received, in which case the requester will be informed.

In case of reasonable doubt regarding the identity of the data subject by such a request to exercise the aforementioned rights, additional information necessary to confirm their identity may be requested, and they may be asked to provide, if required, a photocopy of an identity document bearing their signature. In such a case, the response deadlines mentioned above will be suspended pending the receipt of the additional information necessary to identify the data subject.

The request can be submitted by the data subject or by a person specifically authorized for this purpose by the data subject, provided that this authorized person proves their identity and the identity of the principal, their authorization, as well as the duration and specific purpose of the authorization. The authorization must also specify whether the authorized person can receive the response.

10.3. In any case, you have the right to lodge a complaint with the competent Supervisory Authority (in France, this is the *Commission Nationale de l'Informatique et des Libertés*, known as "CNIL": 3 place de Fontenoy - TSA 80715 – 75334 Paris cedex 07; tel.: 01 53 73 22 22) if you believe that the processing of your personal data is not carried out in accordance with the legal and regulatory provisions regarding the protection of personal data.

Any translation of this Notice is provided solely for reference purposes. In case of discrepancies, only the French version shall prevail.

Date of last update: July 2026