

Privacy Notice

AMG Advanced Metallurgical Group NV ("AMG NV") is the parent company of the AMG Group, and is committed to protecting the privacy of its employees and management and of the individuals with whom it and its group companies are doing business. AMG NV and its group companies conduct their business in compliance with all applicable laws on personal data protection and security.

In view of the EU Data Protection Regulation which has become effective on 25 May, 2018 ("GDPR"), AMG has adopted an EU AMG Data Protection Policy (the "**Policy**") that applies to all AMG Advanced Metallurgical Group NV and/or its owned or controlled subsidiaries and affiliated entities which are incorporated and located in the European Union ("**AMG**") and which are subject to the GDPR, and to its employees, directors, officers, agents and any other persons who, under the direct authority of AMG, who process or are authorized to process personal data and ("**AMG Persons**").

Purpose

The Policy defines effective safeguards and procedures for protecting individuals with regard to Processing their Personal data by AMG. This Policy also articulates the framework of other AMG policies designed to accomplish this Purpose. "Personal Data" is any information relating to an individual who can be identified by reference to a direct identifier (such as a name, an identification number, location data, or an online identifier) or by a combination of attributes describing the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

Rationale

The Policy helps to ensure that AMG: (i) complies with data protection laws affecting the countries in the European Union where AMG operates ("**Applicable Data Protection Laws**"), including, but not limited to **GDPR** and follow good practices; (ii) protects the rights of employees, and any other individuals whose Personal Data AMG Processes; (iii) and is open about how it stores and processes Personal Data. AMG's Processing activities may not constitute a violation of this Policy to the extent AMG complies with the requirements of Applicable Data Protection Laws.

Data Protection Principles

AMG adheres to following data protection principles when processing Personal Data under the Policy:

- 1.1. *Lawfulness, fairness and transparency* - Personal Data will be processed lawfully, fairly and transparently;
- 1.2. *Purpose limitation* - Personal Data will only be collected for specified, explicit and legitimate purposes and will only be processed to satisfy those and other compatible purposes;
- 1.3. *Data minimization* – The Personal Data collected will be adequate, relevant and not excessive in relation to the purposes for which it is collected and further Processed. Personal Data will be rendered anonymous when feasible and appropriate based on AMG's needs and the risks associated with its intended use;
- 1.4. *Accuracy* – Personal Data shall be accurate and, where necessary, kept up-to-date; in case of inaccurate Personal Data AMG will take, after having become aware of it, without delay, reasonable steps to correct or delete such Personal Data having regard to the purposes for which they are Processed.
- 1.5. *Storage limitation* – Personal Data will be kept for only as long as necessary for the purposes for which the Personal Data is Processed;
- 1.6. *Integrity and confidentiality* – Appropriate technical and organizational measures will be taken to prevent unauthorized or unlawful processing and accidental loss, destruction or damage of Personal Data. In particular, Personal data will only be accessed by or disclosed to those individuals who are reasonably required to know such information to accomplish AMG's legitimate business purpose or to enable AMG to comply with applicable legal requirements;
- 1.7. *Accountability* – AMG shall be responsible for and will be in the position to demonstrate compliance with the Data Protection Principles laid down in the Policy. AMG NV and its group companies, consisting of all AMG Advanced Metallurgical Group NV and/or its owned or controlled subsidiaries and affiliated entities which are incorporated and located in the European Union or elsewhere, has installed a Coordinating Data Privacy Office at the Amsterdam headquarters of the AMG Group [email address: info@amg-nv.com], which can be contacted in case of questions, queries concerning the implementation of the Policy. A copy of the Policy is available upon request.