# Privacy Policy

We are Fulcrum Metals plc (referred to as "we", "us" or "Fulcrum" in this Privacy Policy) a company incorporated in England and Wales with company registration number 14409193.

The information set out in this Privacy Policy is provided to individuals whose personal data we process (you or your) as data controller, in compliance with our obligations under the Data Protection Act 2018 and as applicable, the Regulation 2016/679 (the EU GDPR) or the UK GDPR (as defined in the as defined in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations SI 2019/419) (GDPR).

Fulcrum takes privacy seriously and we are committed to protecting it. This Privacy Policy explains when and why we collect personal data about you, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure. We collect, use and share data primarily in providing marketing materials to shareholders and potential investors, as set out further in this Privacy Policy.

If you want to ask us for information about your data or this Privacy Policy, please us using the contact form on this website. Alternatively you can contact our registered office, the address for which is available on the website. In each case, please include "Personal Data Request" in your subject heading to ensure it receives the correct attention.

## HOW WE COLLECT YOUR PERSONAL DATA

Generally, the information we hold about you comes from the way that you engage with us, for example by doing any of the following:

- through engaging with us via our website or applications and providing your details;
- providing us with information in the course of subscribing with us or any newsletters we may operate from time to time;
- contacting us offline, for example by telephone, SMS, email or by post; and
- interacting with us using social media.

We may also obtain information from publicly available sources, including public databases, registers and records.

## INFORMATION WE COLLECT, LEGAL BASIS & PURPOSE FOR PROCESSING

| Personal Data | Relationship | We may use your information for the following purposes, based on the following legal grounds: |
|---|---|---|
| **Contact information** (name, address, email address and telephone number) | **Shareholders/ potential investors**<br><br>**Subscribers of our site** | **If it is necessary for the performance of our contract or for the purposes of entering into a contract**: where you have subscribed for services and information from us.<br><br>**If it is in our legitimate business interests to do so**: for internal administrative purposes, to provide you with marketing materials or other communications to you for dealing with any complaints or issues raised by you for insight purposes (e.g. to analyse market trends) and demographics. You may at any time unsubscribe from receiving marketing communications from us.<br><br>**Compliance with a legal obligation**: in order to prevent fraud or money laundering or to comply with any other relevant legal or regulatory requirements. |
| **Technical and device information** (such as your IP address, traffic data, location data, weblogs and other communication data) | **All visitors of our website** | **If it is in our legitimate interests to do so**: we may use certain technical log data for research or statistical purposes to analyse user traffic and for ensuring the proper administration of our site, and for analytics and insight purposes e.g. to monitor market trends and demographics and to improve the content and layout of our site and ensure that the content of our site is presented in the most effective manner for you and for your computer or other device from which you access our site and/or the services we offer through the site. |
| **Cookies** (and other web-tracking technology) | **All visitors of our website** | **Where consent has been obtained**: We may use non-essential "cookies" and other anonymous web tracking technologies (such as "web beacons" and "pixel tags") implemented by us or by third party service providers.<br><br>**If it is in our legitimate interests to do so**: We may use essential "cookies" implemented via our site for the effective operation of our site.<br><br>A cookie is a small file of letters and numbers that is sent to your device when you visit our site, allowing our site to recognise your browser. If you revisit it. Cookies may store your online preferences and other information about the interaction you make to the site. Please refer to our Cookie Policy [INSERT HYPERLINK] for more information about the type of cookies used and how we use cookies/tracking technologies within our site. |

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## SHARING YOUR INFORMATION

Please note that personal information we are holding about you may be shared with and processed by:

- any member of our group, including our subsidiaries, our ultimate holding company and its subsidiaries;
- regulators, fraud prevention agencies or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services;
- our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
- our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and data storage and security platform providers, our bank, payment processing providers, cloud service providers, hosting, email and content providers, marketing agencies, administrative services providers, and research companies and those organisations we engage to help us send communications to you) so that they may help us to provide you with any applications, services and information you have requested; and
- another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).

Please note that we may include links within our site to third party social media providers such as LinkedIn and Twitter, but we will not share your information with such providers without your consent.

## INTERNATIONAL TRANSFERS

On occasion, the information you provide to us may be transferred to countries outside the UK and European Economic Area (EEA). By way of example, this may happen where any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. We may also provide information to Fulcrum's subsidiaries based in Ireland and Canada. These countries may not have similar data protection laws to the UK.

If we transfer your information outside of the UK or EEA in this way, we will only do so in compliance with the GDPR and where appropriate, we will take steps to ensure that appropriate safeguards are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Policy. These steps include imposing contractual obligations on the recipient of your personal data or ensuring that the recipients are subscribed to 'International frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this Privacy Policy for more information about the protections that we put in place.

## HOW LONG WE KEEP YOUR PERSONAL DATA

We have systems in place to periodically review and delete data that is no longer being used by us for the purposes set out in this Privacy Policy. Unless we are required or permitted by law to hold on to your data for a specific retention period, we will only hold your personal information within our systems for a period of [12] months since your last interaction with us.

Where we no longer need your personal information, we will dispose of it in a secure manner.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## AUTOMATIC DECISION MAKING

We do not make decisions based solely on automated data processing, including profiling.

## SECURITY AND LINKS TO OTHER SITES

Unfortunately, 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 information transmitted to our website and any transmission is at your own risk.

Once we have received your personal data, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Our website may contain links to other websites run by other organisations. This Privacy Policy does not apply to those other websites and so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## MARKETING

We may contact you with marketing information by email, post and telephone by using your personal data or with targeted advertising delivered online through social media and platforms operated by other companies using their profiling tools, or use your personal data to tailor marketing to improve its relevance to you.

You have the right to unsubscribe from such communications at any time by following the link in the footer of the last email you received from us or by sending your request with detailed instructions to us (see contact details above).

## YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA

You have certain rights under existing data protection laws, including the right to (upon written request) access a copy of your personal data that we are processing. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal data. Except in rare cases where additional time may be required, we will respond to you within one month from either (i) the date that we have confirmed your identity, or (ii) where we do not need to do this because we already have this information, from the date we received your request.

In accordance with the Data Protection Act 2018 and the GDPR:
you have the following rights:

- **right to access:** the right to request certain information about, access to and copies of the personal information about you that we are holding (please note that you are entitled to request one copy of the personal information that we hold about you at no cost, but for any further copies, we reserve the right to charge a reasonable fee based on administration costs); and
- **right to rectification:** the right to have your personal information rectified if it is inaccurate or incomplete; and

In certain circumstances, you will also have the following rights:

- **right to erasure ("right to be forgotten:** the right to withdraw your consent to our processing of the data (if the legal basis for processing is based on your consent) and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we are required to hold on to the information for compliance with any legal obligation or if we require the information to establish or defend any legal claim);
- **right to restriction of use of your information:** the right to stop us from using your personal information or limit the way in which we can use it;
- **right to data portability:** the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible; and
- **right to object:** the right to object to our use of your personal information including where we use it for our legitimate interests or for marketing purposes.

If you would like to make a data request, please contact Fulcrum using the "Contact" information on our website. You may also need to provide one form of identification and proof of your address, for example, stuff gas, driving licence, utility bill, and if appropriate, any particulars about your request or in the case of a subject access request, the source or location of the information you are requesting.

Please note that if you withdraw your consent to the use of your personal information for purposes set out in our Privacy Policy, we may not be able to provide you with access to all or certain parts of our site. If you withdraw your consent, our use of your personal data before you withdraw is still lawful.

We'd like to be able to resolve all your concerns, and we hope that we can do so. Where we haven't been able to do this, you have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal data. Please visit the ICO's website for further details: https://ico.org.uk.

## CHANGES TO THIS PRIVACY POLICY

We may review and amend this Privacy Policy from for example to keep it up to date, to implement minor technical adjustments and improvements or to comply with legal requirements. We will always update this Privacy Policy on our site, so we recommend you regularly check for changes and review this Privacy Policy whenever you visit our website. If you do not agree with any aspect of the updated policy, you must immediately notify us and cease using our site.