# Privacy Notice

*FQM Trident Limited*

## Introduction

This Privacy Notice

In this Notice, **FQM Trident**, **we**, **our** or **us** refers to FQM Trident Limited. The operating company is a legal entity and is registered as a controller of personal data in the jurisdiction in which it operates. The controller responsible for your personal data is the FQM Trident entity that determines the purposes and means of the processing in question. The entities in the group, the jurisdictions in which they are registered, and the notices that apply to their processing, are set out in our Controller Schedule.

FQM Trident operates this website and is the controller for the personal data collected through it. Our Data Protection Officer can be contacted using the details in the Contact us section. Where required, we have appointed a representative in the European Union and the United Kingdom, whose details are available in the Contact us section. Processing means anything we do with personal data, including collecting it, using it for a specific purpose, storing, sharing, transferring and deleting it.

FQM Trident processes personal data for a variety of purposes. We collect personal data directly from you, for example if you visit our website, submit your contact details to receive updates from us, apply for a role with us, supply goods or services to us, visit one of our offices or operations, or engage with us in the communities in which we operate. We also obtain personal data from other sources, such as publicly available sources, recruitment agencies and parties who provide data to us in the course of our business. This Notice is intended to cover these and any other circumstances in which we process your personal data.

## What data is covered

In this Notice, personal data means any information relating to an individual who can be identified, directly or indirectly, by reference to an identifier such as but not limited to a name, an identification number, location data or an online identifier.

It also includes special or sensitive categories of personal data, which are given additional protection under applicable law, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, and data concerning a person's sex life or sexual orientation, as well as personal data relating to criminal convictions and offences.

## Who this Notice is for

- Visitors to our website
- Investors, shareholders and the financial community
- Job applicants
- Employees
- Contractor personnel
- Suppliers and their representatives
- Visitors to our offices and operations

- Members of communities in which we operate
- Scholarship and community programme beneficiaries (including minors)
- Dependants, next of kin, emergency contacts and beneficiaries
- Individuals who correspond with us

Some groups of people are covered by a separate, more detailed notice. If a separate notice applies to you, it will be provided to you directly or displayed where the relevant personal data is collected. If you are unsure which notice applies to you, or you would like a copy, please contact us using the details in the contact section.

Use the index below to find the information that applies to you. Each entry explains the personal data we process, the purposes for which we process it, and the lawful basis on which we rely.

## Purposes for which we process personal data

This section explains the personal data we process about the different people who deal with us, and why. Where a more detailed notice applies to you, it will be provided to you directly or displayed where your personal data is collected; if you are unsure which notice applies, contact us using the details in the contact section.

**Visitors to our website**

When you visit our website, we collect the information you choose to give us, for example when you complete a form to contact us, subscribe to receive updates, or register for an event. We also collect technical information automatically, such as your IP address, device and browser details, and how you move through the site, using cookies and similar technologies as explained in our Cookie Policy.

We use this information to operate and secure the website, to respond to you, to send you the updates you have asked us to send, and to understand and improve how the site is used. We send you marketing updates only because you have asked us to, and you can stop them at any time. We operate and secure the site because this is necessary to provide it to you and to protect it against misuse.

**Investors, shareholders and others in the financial community**

We process the personal data of investors, analysts and others in the financial community, such as your name, contact details, the organisation you represent and your dealings with us, so that we can communicate with you, manage investor relations, and meet our obligations as a listed company. We do this because it is necessary to run our investor relations activities and to comply with the laws and listing rules that apply to us, and, where you have subscribed to investor updates, because you have asked us to send them.

If you hold shares in FQM Trident directly in your name, your shareholder record is maintained by our share registrar, which is responsible for that record and processes it under its own privacy notice. If you hold your shares through a broker, bank or other intermediary, we do not hold your personal data in connection with your shareholding, and any questions about your information should be directed to the intermediary through which your shares are held.

**Job applicants**

When you apply for a role with us, we process the information in your application, such as your CV, identification, qualifications, work history and references, and any further information gathered during interviews and pre-employment checks. We use it to assess your application, to communicate with you, and, where you are successful, to prepare to bring you on board. We do this because it is necessary to take steps at your request before entering into a contract and because we have a genuine interest in assessing and selecting candidates, and, where the law requires checks on your eligibility to work, to meet that legal obligation. Our recruitment system has its own notice, which is presented to you when you apply.

**Contractor personnel**

If you work at one of our operations as personnel of a contractor, we process your personal data to manage and record site access, to keep our sites and people safe, to carry out inductions, and to meet our health, safety and security obligations. This may include your identity and contact details, identification and access records, and information collected through site systems. We do this because it is necessary to run and protect our operations safely and to meet the legal obligations that apply to us. Closed-circuit television at our operations and offices are covered by a separate notice displayed at the site.

## Suppliers and their representatives

We process personal data about the people who represent our suppliers and contracting organisations, such as contact details and the information needed to administer the contract and make payments. We also carry out due diligence and background checks where these are required. We do this because it is necessary to manage the contract and our relationship with the supplier, to make and receive payments, to meet our legal obligations, and to protect against unlawful conduct.

## Visitors to our offices and operations

When you visit one of our offices or operations, we process your personal data to control and secure access, to keep our people and property safe, and to meet our health, safety and security obligations. This is generally limited to your name and contact details, identification and vehicle details, and the record of your entry and exit, together with information collected by access systems. We do this because it is necessary to control access to and protect our premises and to meet the legal obligations that apply to us. Closed-circuit television at our operations and offices are covered by a separate notice displayed at the site.

## Members of communities in which we operate

We process the personal data of members of the communities in which we operate, for example through stakeholder engagement, grievance mechanisms, social investment and local development programmes, and, where applicable, land and resettlement processes. The information we process depends on the programme or interaction concerned. We do this because it is necessary to engage responsibly with the communities affected by our operations and to manage our programmes, to meet legal and regulatory obligations, and, where we ask for it for a specific purpose, because you have agreed.

We also use information relating to our operations, our workforce and the communities in which we operate to prepare our sustainability and environmental, social and governance (ESG) reporting. For this purpose, information is usually aggregated or de-identified, and any personal data shared with another FQM Trident entity to prepare group reporting is shared for

that limited purpose under arrangements that protect it. The group operating company that collected the information remains responsible for it.

## Scholarship and community programme beneficiaries

If you take part in one of our scholarship, bursary, training or community programmes, we process the personal data needed to assess eligibility, administer the programme, and meet our reporting and record-keeping obligations. Some of our programmes involve young people under the age of 18; where this is the case, a parent or guardian acts on the young person's behalf, and any health or other sensitive information is handled by qualified health practitioners and used only as far as necessary for the programme. We do this because it is necessary to run the programme and to meet our obligations, and, where we ask for sensitive information, with the appropriate agreement and protections.

### Dependants, next of kin, emergency contacts and beneficiaries

We process limited personal data about dependants, next of kin, emergency contacts and beneficiaries, such as names and contact details, so that we can administer benefits, respond in an emergency, and meet our obligations. This information is usually given to us by an employee or another person, rather than by the individual directly. If you provide us with another person's details, please make sure they know and understand how their information will be used. We process this information because it is necessary to administer benefits and to respond in an emergency.

### Individuals who correspond with us

If you contact us by email, telephone, post or online, we process the information in your communication so that we can handle it, respond to you, and keep a record where appropriate. We also operate security measures on our systems, which may scan communications to protect against malicious activity. We do this because it is necessary to respond to you and to protect our systems, and, where a communication concerns a legal or regulatory matter, to meet our obligations.

## The legal bases we rely on

Data protection law requires us to have a legal basis for each use of personal data described in this Notice. Across the activities above, we rely on the following:

- Your consent, where you have asked us to send you updates, accepted non-essential cookies, or agreed to a specific use we have asked you about. You can withdraw your consent at any time.
- Performance of a contract, or steps taken at your request before entering into one, where we process personal data to manage a contract with you, to administer a programme you take part in, or to assess your application for a role with us.
- Compliance with our legal obligations, where we process personal data to meet the legal, regulatory and listing requirements that apply to us, including health, safety and security obligations at our sites.
- Our legitimate interests, where processing is necessary to run our business in ways you would reasonably expect such as operating and securing our website and systems, managing relationships with investors, suppliers and the communities in which we operate, controlling access to and protecting our sites and people, administering benefits and responding in emergencies, and responding to people who contact us. Where we rely on this basis, you have the right to object, as set out in the Your rights section.

- Where we process special categories of personal data, we do so only where an additional condition applies, such as your explicit consent or where processing is necessary to meet our obligations under applicable law.

## Who we share your personal data with

We share personal data only where it is necessary for a purpose described in this Notice and permitted under applicable law. The categories of recipient are:

- Service providers who process personal data on our behalf, such as providers of information technology, hosting, analytics, communications, security, access control, background checking and document management services;
- The providers of third-party systems and platforms we use for effective business management, which include but are not limited to systems for managing recruitment, human resources, payroll, site access, operations and communications, and which process personal data on our behalf as part of providing those systems to us;
- Our professional advisers, such as lawyers, auditors and consultants;
- Other FQM Trident entities, where there is a lawful basis and it is necessary for a specific purpose, under arrangements that protect your personal data. Each entity remains responsible for the processing it carries out;
- Regulators, law enforcement agencies, courts and other public authorities, where required or permitted by law; and
- Parties involved in a corporate transaction, such as a restructuring, sale, acquisition or financing, and their advisers.

Where a service provider processes personal data on our behalf, it does so under a written agreement that requires it to protect the personal data and to use it only for the purposes we have authorised.

## Transfers of personal data

FQM Trident operates in a number of countries. Personal data may be transferred to, stored in, or accessed from a country other than the one in which it was collected, including by service providers and by FQM Trident entities, for the purposes described in this Notice. Where a transfer takes place, we rely on the transfer mechanism required by the law applicable to that transfer, which may include contractual safeguards that require a comparable level of protection, the consent of the individual, or the approval of the relevant authority where required.

Where we transfer personal data to a country that is not the subject of an adequacy decision, we rely on appropriate safeguards, in particular the Standard Contractual Clauses approved by the European Commission and, for transfers from the United Kingdom, the International Data Transfer Addendum issued by the Information Commissioner's Office, supplemented where necessary by additional measures. We remain accountable for personal data that we transfer for processing on our behalf.

You can ask us for more information about how your personal data is protected when it is transferred by contacting us using the details in the Contact us section.

## Retention

We retain personal data only for as long as it is needed for the purposes described in this Notice, and for any further period required by law. Retention periods vary by jurisdiction and

by the type of processing, and are set in accordance with local legal, regulatory and operational requirements.

Where a specific period is not stated, we determine it by reference to the purpose for which the personal data was collected, the requirements of applicable law, and the periods within which legal claims can be brough

## Automated Decision Making

We do not make decisions about you based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you. If that changes, we will update this Notice and provide you with the information required by law.

## Security

We use appropriate technical and organisational measures to protect personal data against loss, misuse and unauthorised access, disclosure, alteration or destruction. Access to personal data is limited, and we put appropriate safeguards in our agreements with service providers.

## Your rights in relation to personal data

Subject to the law that applies to the processing, you have the following rights in relation to your personal data:

- To access the personal data we hold about you, and to be told how it has been used and to whom it has been disclosed;
- To have your personal data corrected if it is inaccurate or incomplete;
- To opt out of receiving marketing communications at any time;
- To restrict or object to processing, or to request erasure of personal data, in certain circumstances and subject to applicable law;
- To receive a copy of the personal data you have provided to us, in a structured, commonly used and machine-readable format, in certain circumstances; and
- Where we rely on your consent, to withdraw your consent at any time.

These rights are not available in every case and may be subject to limitations under applicable law. To exercise a right, please contact us using the details in the contact section. We may ask you to confirm your identity before we respond, and we will respond within one month, extendable where a request is complex, in which case we inform you.

## Contact Us

If you have any questions about this Notice or wish to exercise any of your rights, contact our Data Protection Office at DPO@fqml.com . If you would like to take a matter further, you may also contact the data protection authority in Zambia https://www.dataprotection.gov.zm/.

## Changes to this Notice

We will occasionally update this Notice to reflect changes in our practices and in the law. The version published is the current version, and its date is shown below. Where a change is significant, we will take reasonable steps to bring it to your attention.

## Related notices and policies

The following provide further information on how FQM Trident handles personal data:

- The Controller Schedule, listing each First Quantum entity, its jurisdiction and regulator, and links to the privacy notices that apply to its processing [insert link];
- The Cookie Policy [insert link];
- The Employee Privacy Notice, the CCTV Privacy Notice and other context-specific notices, which are provided at the point of collection and are available on request by contacting us using the details in the Contact us section.