

PERSONAL DATA PROTECTION

DPM's operations in Bulgaria ("the Operations") process personal data of individuals (data subjects) in compliance with Regulation (EU) 2016/679 of The European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and the Bulgarian Personal Data Protection Act.

Each Operation has the capacity of an independent personal data controller for the personal data they process.

1. CATEGORIES OF DATA SUBJECTS

The Operations process personal data of the following data subject categories under the terms specified in the respective Privacy notices:

- a. employees;
- b. job applicants;
- c. contractors;
- d. suppliers;
- e. visitors at office and industrial premises of the Operations;
- f. donation/sponsorship applicants.

2. PURPOSE OF PROCESSING

Overall, the Operations may process personal data for any of the following purposes, depending on the respective category the data subject listed above falls in:

- a. to meet obligations deriving from contracts with the respective natural persons;
- b. to meet regulatory obligations of the Operations, including labor, accounting, taxation and social security legislation or other legal obligations of the Operations;
- c. administration processes required for personnel recruitment;
- d. review of proposals under tenders for selection of contractors;
- e. anti-bribery assessment;
- f. verification to confirm authorization of company representatives, who are potential partners of the Operations;
- g. administration of donation/sponsorship applications;
- h. control to ensure compliance with the policies applicable at the Operations, including the internal rules, procedures and investigations within the Operations.
- i. management of projects and programs;
- j. provision of access to the Operations (industrial sites and offices) and ensuring the security of their properties, assets, sites, infrastructure, premises, employees and systems, including by video surveillance;
- k. protection of the Operations' interests through court proceedings and extrajudicial settlements.

3. LEGAL GROUNDS OF PROCESSING

The Operations process personal data on some of the following legal grounds:

- a. the processing is required for implementation of a contract, where the data subject is a contractual party, or in order to undertake steps with regards to a data subject's request prior to a contract signature;
- b. the processing is required to ensure compliance with legal obligations applicable to the Operations;
- c. freely expressed, specific, informed and unambiguous consent of the data subject;
- d. legitimate interests of the Operations or a third party, to the extent they prevail over the interests or basic rights and freedoms of the data subjects.

4. PERSONAL DATA RECIPIENTS

The personal data processed by the Operations may be provided to:

- a. government institutions: the National Revenue Agency, National Social Insurance Fund, Labor Inspectorate, etc.
- b. persons or entities, which have the capacity of a processors, which has an effective contract with the Operations in terms of data processing in compliance with the General Data Protection Regulation (for instance, accounting firms, Labor Medicine Services, etc.);
- c. any third parties, acting as independent data controllers (such as service suppliers, social services or perks).

5. PERSONAL DATA PROCESSING AGREEMENT

The Operations store personal data for as long as required to meet the objectives the data were collected for or to ensure compliance with the regulatory requirements to data storage duration. Once the respective deadlines expire, the personal data are destroyed /deleted, unless required in connection with any legal claims, which should be established, filed or defended against.

6. PERSONAL DATA SECURITY

The Operations maintain suitable technical and organizational measures to protect the personal data against accidental or illegal destruction, loss, alteration, unauthorized disclosure or access.

The Operations provide a level of personal data security, which adequately reflects the risks involved in their processing, given the available technological advancements, the costs of their implementation and the nature, context and purpose of their processing, as well as the risks for the data subjects. The purpose of those measures is to ensure the ongoing availability, integrity and confidentiality of any personal data. The Operations regularly assess those measures in order to ensure the data security as they process the data.

7. RIGHTS OF THE DATA SUBJECTS

Any individual whose data are processed by the Operations has the following rights:

- a. right to a confirmation whether the Operations process their personal data, and if so, receive access to their data and certain information about the type of processing, and a copy of the personal data, which are being processed;
- b. right to rectification, if the data are inaccurate or incomplete;
- c. right to erasure of personal data ("the right to be forgotten") in the following cases:
 - the personal data are no longer needed for the purpose they had been collected or processed;

- the individual has withdrawn their consent the processing was based upon, and there are no other legal grounds in place for the personal data processing;
 - the individual has objected against the personal data processing, which was based on legitimate interests of the Operations, unless there are other legal grounds of the processing, which prevail over the interests, rights and freedoms of that individual;
 - the personal data were unlawfully processed;
 - the personal data should be erased in order to meet a legal obligation under the EU legislation or a EU member's legislation applicable to the Operations;
- d. right to limit the processing in the following cases:
- the accuracy of the personal data is objected by the individual for a period, which allows the Operations to check the accuracy of the personal data;
 - the processing is unlawful, but the individual does not wish to have their data erased, and instead wants restrictions on the data use;
 - The Operations no longer need the personal data for processing purposes, but the individual requests their data in connection with any legal claims, which should be established, filed or defended against;
 - the individual objects against the personal data processing, which was based on legitimate interests of the Operations, within a period where inspection is pending to identify where the legal grounds of the Operations prevail over the interests of the individual.
- e. right to a transfer – the individual has the right to receive the personal data they had provided to the Operations where their data were processed by automated means on the basis of a consent or contractual obligation, in a structured, common-use and machine readable format, and may transfer their data to another controller without obstruction by the Operations, as well as request from the Operations to directly transfer the personal data to another controller, if practically possible;
- f. right to object – the individual may, at any time, and on the grounds associated with their particular situation, object against the processing of their personal data, which is based on legitimate interests of the Operation;
- g. right to withdraw a consent - the individual may withdraw their data processing consent at any time (when processing is based on such grounds), and such withdrawal would not affect the legitimacy of any processing taken place before the withdrawal.
- h. right to not be the subject of a decision based solely on automated processing, including profiling, which brings about legal consequences for that individual or in a similar way substantially impacts them.

In compliance with the Personal Data Protection Act, individuals may exercise the the above rights by filing a request. Such written request may be also sent by electronic means under the terms and conditions of the Act on Electronic Documents and Identifications. Such a request may be filed personally by the data subject or by their authorized representative.

8. RIGHT TO APPEAL

In compliance with the Personal Data Protection Act and the General Data Protection Regulation, each individual, who believes their right to data protection has been violated, may file a complaint with the Commission for Personal Data Protection, whose contact details are provided on their website: <https://www.cdpd.bg/?p=pages&aid=5>, or another supervisory authority, if applicable under the General Data Protection Regulation.

9. CONTACT WITH THE OPERATIONS

If you wish to exercise any of your rights or have questions about the processing of your personal data as detailed in Section 7 above, please contact the Legal Department at: Dundee Precious Metals Chelopech EAD, Chelopech 2087, Sofia District, e-mail: Data.Protection@dundeeprecious.com. The Legal Department will review your request/complaint, and will send you a response within one month from your submission. If required, that deadline may be extended by another two months, depending on the complexity and number of such requests. We will notify you about such extension within one month from receipt date of such request/complaint and will specify the reasons for the delay.

10. GENERAL PROVISIONS

The purpose of the information above is to provide a general overview about the processing of personal data by the Operations. The privacy notices provide more specific and detailed information about the processing of data subjects' personal data by each Operation, as specified in Section 1 above.

The information given here is valid as of 01/01/2019.