 ALIANZA POR LA MINERÍA RESPONSABLE	Policy for the Processing of Personal Data	Version: 2
		Approval Date: 10/05/2024
		Page: 1 from 7

INTRODUCTION

The Fundación Alianza por la Minería Responsable, also recognized as ARM or Alliance for Responsible Mining, identified with Tax ID (NIT) 900.225.197-3, non-for-profit entity, duly constituted before the Cámara de Comercio de Aburra, Colombia, is pleased to disclose its policy for the processing of personal data; Which should be of interest to all holders of personal information that is used and / or found in the databases of the Alliance for Responsible Mining, who acts as responsible for the processing of personal data; All this in accordance with the provisions of Law 1581 of 2012 and Decree 1377 of 2013, Colombia.

OBJECTIVE

The Personal Information Processing Policy of Fundación Alianza por La Minería Responsable, has the purpose of establishing the parameters and/or procedures for the administration of the personal data of the different owners that are used or registered in the database of ARM and therefore to ensure their protection in accordance with the regulations of the Colombian Law.


APPLICATION

This policy applies to all those data, which in the exercise of any activity related to the corporate purpose of ARM are being collected, used or transferred to suppliers, contractors, employees, volunteers, allies, licensees, jewelers, beneficiaries and in general, and by virtue of the existence of the respective authorization by the owners.

DEFINITIONS

The following definitions are terms that are enshrined in Law 1581 of 2012, Colombia and that should be taken into account for the understanding and application of the Policy for the processing and protection of personal data of the Fundación Alianza por la Minería Responsable:

- *Authorization*: Prior, express and informed consent of the Data Holder to carry out the Processing of personal data.
- *Data Base*: Organized set of personal data that is subject to Processing.
- *Personal data*: Set of information susceptible of being related to one or more natural persons.
- *Data Processor*: Natural or legal person, public or private, that by itself or in association with others, performs the Processing of personal data on behalf of the Data Controller.
- *Data Controller*: Natural or legal person, public or private, who by himself or in association with others, decides on the database and/or the processing of the data.
- *Data Holder*: Natural person whose personal data is the object of processing.
- *Processing*: Any operation or set of operations on personal data.
- *Sensitive data*: data related to racial or ethnic origin, membership in trade unions, social or human rights organizations, political, religious, sexual orientation, biometric or health data. This information may not be provided by the Holder of this data.

 <p>ALIANZA POR LA MINERÍA RESPONSABLE</p>	<p>Policy for the Processing of Personal Data</p>	Version: 2
		Approval Date: 10/05/2024
		Page: 2 from 7

PRINCIPLES

- *Purpose:* The treatment given by ARM to the personal data it treats, obey the purposes set forth in this policy.
- *Freedom:* Processing may only be carried out with the prior, express and informed consent of the Data Holder. Personal data may not be obtained or disclosed without prior authorization.
- *Truthfulness or Quality:* The information subject to processing by ARM must be truthful, complete, updated, verifiable and understandable.
- *Transparency:* The holder of the personal data is guaranteed that they may obtain information about their data at any time and without restrictions in accordance with the procedures described in this policy.
- *Restricted access and circulation:* Processing is subject to the limits derived from the nature of the personal data, the provisions of this law and the Colombian Constitution. Personal data, except for public information, and as provided in the authorization granted by the owner of the data, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the Owners or authorized third parties.
- *Security:* The information subject to Processing by ARM, shall be protected through the use of technical, human and administrative measures necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- *Confidentiality:* All persons involved in the processing of personal data are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks involved in the processing.

PURPOSE OF USE OF PERSONAL DATA


The following are the personal data of the Holders that are collected by ARM in the development of its corporate purpose:

- Type of identity document
- ID number
- Name and Surname
- Address
- Office phone
- Residence phone number
- Mobile phone
- E-mail address
- City
- Department
- Country
- Gender and date of birth¹.

The Personal Data collected by ARM in the exercise of its activities have the following purposes:

- Academia, Training Center
- Development cooperation
- Media and communications
- Market and supply chain access

¹ Data such as gender and date of birth are not mandatory for collection

 ALIANZA POR LA MINERÍA RESPONSABLE	Policy for the Processing of Personal Data	Version: 2
		Approval Date: 10/05/2024
		Page: 3 from 7

- Employee relations
- Relationships with Suppliers of goods and services, Consultants
- Development of Programs and Projects in implementation
- Membership access
- Business Sector
- Public Sector
- Civil Society
- Validate the information in compliance with the legal requirement and knowledge of the third party.
- For the consultation and validation of judicial and legal antecedents, among others, at the moment of joining the Foundation.

The ARM foundation does not disclose, sell or rent to third parties the personal information provided by the Owners and/or users of its Website. Such information will be kept with the proper security and confidentiality conditions established in this Policy and in the legal regulations governing the matter and its use will be exclusively for the purposes for which it was provided. However, it is possible that ARM may have to share such information with other institutions or persons with which it has some kind of relationship, or that by legal provision it is obliged to do so, as in the following cases (article 13 of Law 1581 of 2012):

- That of its employees, beneficiaries, contractors or consultants, in order to support the operations and activities aimed at developing its corporate purpose.
- That of the judicial offices or administrative authorities when so required, in accordance with the final clause of Article 15 of the Colombian National Constitution.


It is likely that as a consequence of an institutional organization process, the Foundation may allow that the Personal Information provided by the Holders may be consulted or used for specific cases by other members of the Foundation, such as for example: The teams in the field. In these cases, it should be understood that if the Foundation permits, it does so solely and exclusively for the purposes of the programs and projects it carries out, but always linked to the Foundation and its activities and never outside the reasons and purposes for which the information was collected. Consequently, third parties who access this information may not use it in any case to contact the Holders or other members of the Foundation for commercial, professional, service or any other purposes.

The information provided by the Holder, will only be used for the purposes stated herein and once the need for the Processing of Personal Data ceases, the same may be removed from the databases of The ARM Foundation or archived in secure terms in order to only be disclosed when required by law.

PROCEDURE FOR THE PROCESSING OF PERSONAL DATA

Personal Data will be collected by the ARM Foundation, through attendance lists (digital template, physical), ARM membership forms and Fairmined Program, and will be stored in the CRM Salesforce, which has assigned an administrator and nine users from the different Area of the organization.

By virtue of protecting and maintaining the confidentiality of the Personal Data of the Holders, The ARM Foundation determines that the procedure to know, update, rectify, suppress information or revoke the

 ALIANZA POR LA MINERÍA RESPONSABLE	Policy for the Processing of Personal Data	Version: 2
		Approval Date: 10/05/2024
		Page: 4 from 7

authorization for the Processing of Personal Data, implies the duty of the Holder to contact The ARM Foundation through the following means:

- Sending a written request duly signed by the holder to the e-mail buzondesugerencias@responsiblemines.org, which must be accompanied by a copy of the identity document of the Holder.
- Sending by mail a physical letter to the address of the ARM Foundation, which must be accompanied by a copy of the Holder's identity document.

The Owners of Personal Data may, at any time, request The Foundation to delete their data and/or revoke the authorization, by filing a claim in accordance with the provisions of Article 15 of Law 1581 of 2012. It is essential to note that the request for deletion of information and the revocation of the authorization shall not proceed when the Holder has a legal or contractual duty with the ARM Foundation or when it is prevented by a legal provision.

AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA

From the entry into force of this Policy, the ARM Foundation, at the time of collecting Personal Data, will request authorization from the Data Holders, informing about the specific purposes of the Processing for which such consent is obtained.

The authorization of the Data Holders may be expressed orally or in writing and The ARM Foundation will keep the proof of such authorizations in an appropriate manner, respecting the principles of confidentiality and privacy of the information.


The authorization for the processing of personal data will serve, in turn, as consent by the owner of the data for the search and validation of personal background at the time of linking to the Foundation under any modality.

At the time of requesting the authorization, the owner of the data must be informed:

- The processing to which your personal data will be submitted and the purpose of such processing.
- The rights you have as Holder.
- The identification, physical or electronic address and telephone number of the Data Controller.

It is not necessary to request the authorization of the holder of the personal data in the following cases:

- Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- Data of a public nature.
- Cases of medical or sanitary emergency.
- Processing of information authorized by law for historical, statistical or scientific purposes.
- Data related to the Civil Registry of Persons.

 ALIANZA POR LA MINERÍA RESPONSABLE	Policy for the Processing of Personal Data	Version: 2
		Approval Date: 10/05/2024
		Page: 5 from 7

RIGHTS OF THE HOLDER OF THE PERSONAL DATA


The holder of the personal data shall have the following rights:

- To know, update and rectify their personal data against The ARM Foundation in its capacity as data controller. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading, or those whose treatment is expressly prohibited or has not been authorized.
- Request proof of the authorization granted to The ARM Foundation, except in those cases expressly exempted in the Law.
- Be informed by The ARM Foundation, upon request, regarding the use it has made of your personal data.
- File complaints with the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and other regulations that amend, add to or supplement it.
- To revoke the authorization and/or request the deletion of the data, when the processing does not respect the principles, rights and constitutional and legal guarantees. Except in cases where the holder has a legal or contractual duty to remain in the database of the Controller or Processor.
- Access free of charge to their personal data that have been subject to processing. The information requested by the holder may be provided by any means, including electronic ones, as required by the holder. The ARM Foundation shall make available to the owner of the information, mechanisms and easy access to submit the request for deletion of data or revocation of authorization.

DUTIES OF THE ARM FOUNDATION AS THE CONTROLLER OF PERSONAL DATA PROCESSING

Taking into account the responsibility that The ARM Foundation has as responsible for the processing of personal data, the following are the duties that it has for the processing of data:

- Guarantee to the Data Holder, at all times, the full and effective exercise of the right of habeas data.
- Request and keep a copy of the respective authorization granted by the owner.
- Duly inform the owner about the purpose of the collection and the rights he/she has by virtue of the authorization granted.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access.
- Ensure that the information provided to the data processor is truthful, complete, accurate, up-to-date, verifiable and understandable.
- Update the information, communicating in a timely manner to the data processor, all developments regarding the data previously provided and take other necessary measures to ensure that the information provided to it is kept up to date.

 ALIANZA POR LA MINERÍA RESPONSABLE	Policy for the Processing of Personal Data	Version: 2
		Approval Date: 10/05/2024
		Page: 6 from 7

- Rectify the information when it is incorrect and communicate the pertinent to the person in charge of the processing.
- To provide to the Data Processor, as the case may be, only data whose Processing is previously authorized.
- To require the Data Processor at all times to respect the security and privacy conditions of the Data Holder's information.
- Handle inquiries and claims formulated.
- Inform the Data Processor when certain information is under discussion by the Data Holder, once the claim has been filed and the respective process has not been completed.
- Inform upon request of the Data Holder about the use given to their data.
- Inform the data protection authority when there are violations to the security codes and there are risks in the administration of the information of the Data Holders.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.


IDENTIFICATION AND AREA OF THE PERSON RESPONSIBLE FOR THE PROCESSING OF THE INFORMATION AT THE FOUNDATION ARM

Company name:	Fundación Alianza por la Minería Responsable
Address:	Calle 32 B Sur No. 44ª -61 - Envigado, Antioquia, Colombia.
Taxpayer's ID:	900.225.197-3
e-mail:	arm@responsiblemines.org buzondesugerencias@responsiblemines.org
Phone:	+57 604 332 47 11
Website:	www.responsiblemines.org

The Administrative and Financial area is in charge of receiving requests, complaints or claims from the Data Holders. This area will be in charge of the necessary internal management in order to guarantee a clear, efficient and timely response to the Data Holder.

THE NATIONAL DATABASE REGISTRY

The Registro Nacional de Bases de Datos (RNBD) - National Registry of Databases - is the public directory of databases subject to processing operating in the country and will be administered by the Superintendencia de Industria y Comercio - Superintendence of Industry and Commerce - and will be freely consulted by citizens.

 ALIANZA POR LA MINERÍA RESPONSABLE	Policy for the Processing of Personal Data	Version: 2
		Approval Date: 10/05/2024
		Page: 7 from 7

VALIDITY

The present Policy for the processing of personal data of the ARM Foundation, is in force from the date of its publication; Personal Data or databases subject to Processing, shall be in force for the period in which the purpose for which they were collected subsists, plus the term established by Colombian Law.

OTHER DISPOSITIONS

For the purposes of the special Processing of Personal Data of children and adolescents, THE FOUNDATION shall prevail and respect the best interests of these and also ensure respect for their fundamental rights, in accordance with the provisions of Article 7 of the Statutory Law 1581 of 2012 and Article 12 of Decree 1377 of 2013.