

Data Privacy Policy

1 OBJECTIVES

All processing of personal data by Boliden must be carried out in a manner that ensures that the processing is lawful and complies with the basic principles for processing in the applicable data protection law and that enables the individual whose information is being processed (employees, customers, suppliers, etc.) to feel confident about our data handling. It is the responsibility of each employee to comply with this policy in any and all processing of personal data which that employee carries out as part of his/her day-to-day work.

2 DEFINITIONS AND EXPLANATIONS

The following definitions are used in this policy:

Personal data

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, with the help of an 'identifier', i.e. a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

Processing

Any operation or a set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller

A natural or legal person, such as Boliden, which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Processor

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

3 SCOPE AND RESPONSIBILITIES

This policy for processing of personal data applies for all companies and employees within Boliden.

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It is the responsibility of each employee to comply with this policy in any and all processing of personal data which that employee carries out as part of his/her day-to-day work.

The overall responsibility for Boliden's compliance with this policy rests with the following:

CEO

The CEO (also the controller) must ensure that there is a suitable organisation, delegated responsibility and tasks, and sufficient resources for the work involved in processing of personal data within the company.

Data protection organisation

Boliden has established a data protection organisation that is tasked with providing Boliden's organisation with support on how to comply with the applicable data protection law. This task includes implementing and verifying Boliden's GDPR compliance, providing guidance and recommendations on the balancing of risk, and in relevant forums (data privacy board and, when applicable, Group Management) making data protection-related decisions.

The data protection organisation comprises the following roles and forums:

- **Data privacy board**

Should preferably be represented by the following roles/departments, where at least one representative is a member of the Group's management team: Corporate responsibility, Legal, HR, BA Mines, BA Smelters, IT, System owner for the processing record.

The data privacy board shall:

- Decide on priorities, resources and budget
- Assign roles in the data privacy organisation
- Ensure that the DPO has the right conditions

- **Data Protection Officer (DPO)**

Boliden has appointed a Data Protection Officer (DPO) in order to inform and advise, be an escalation point for data protection issues, and to monitor compliance as regards Boliden's processing of personal data. The DPO must also cooperate with and be the contact point for the supervisory authority. The DPO shall have a comprehensive view of Boliden's compliance and the greatest risks, as well as the work on these. The DPO will report to the data privacy board and, if needed, directly to Boliden's management team.

- **HR Board**

Should be involved as a reference group to prioritise actions in the area of employee personal data.

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The HR board should also be responsible for assigning task forces if other than the data privacy coordinators are needed to look into specific areas and to identify requirements.

- **Data privacy support**

The support organisation is the DPO’s work group, which, together with the DPO, identifies and proposes how activities to increase compliance with the applicable data protection law are best implemented. They coordinate the work with data privacy coordinators. Each support function is responsible for its functional area and shall have knowledge of the applicable data protection law and Boliden’s steering documents.

- **Data privacy coordinators**

There is a data privacy coordinator for each business unit or function. The data privacy coordinators shall ensure that this policy is implemented within their respective unit/function. They are the primary contacts for all employees in data privacy matters. They are responsible for updating the processing record when changes to processing and/or collection of more personal data are being identified.

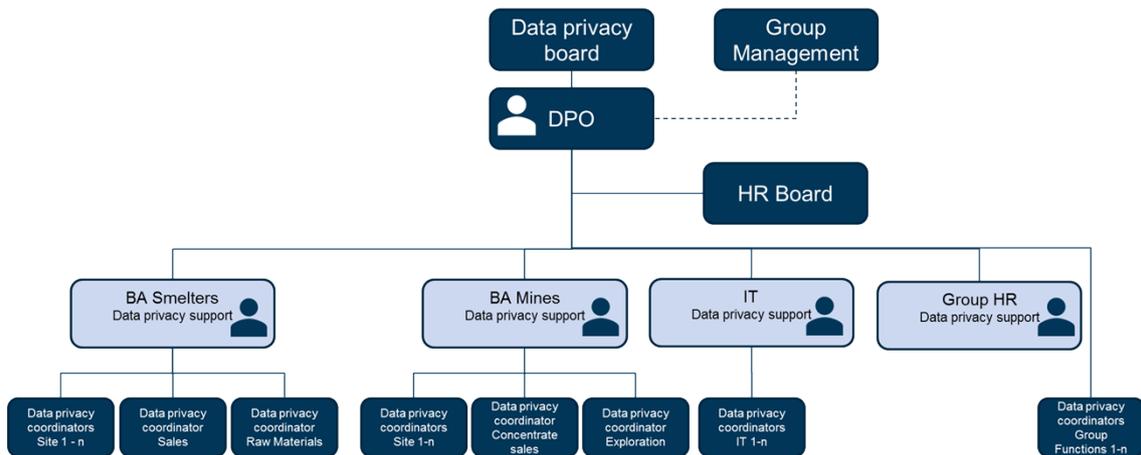


Figure 1: Data privacy organisation, schematic view

Employees

Each employee is responsible in his/her day-to-day work for lawful and fair processing of personal data. By following the Boliden Group’s steering documents in respect of processing of personal data, the employee is contributing to the satisfactory processing of personal data.

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4 POLICY

Boliden must implement appropriate technical and organisational measures to ensure and be able to demonstrate compliance with the applicable data protection law.

Boliden must, in the processing of personal data, comply with the principles set out in the General Data Protection Regulation, meaning that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject (lawfulness, fairness and transparency).
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (purpose limitation).
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation).
- d) accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (accuracy).
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (storage limitation).
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality).

Boliden must be able to demonstrate compliance with these principles, and Boliden's processing of personal data must for that purpose be documented in a structured and clear manner.

Boliden must take appropriate measures to respect the rights of data subjects.

Boliden must ensure that any new system or processing procedure that is introduced within the Group and which includes processing of personal data is designed in such a way that effective protection of the personal data is integrated into the processing (data protection by design).

Boliden must further ensure that, by default, only personal data which are necessary for each specific purpose of the processing are processed. This applies to the amount of personal data collected, the extent of their processing, the period of their storage and their accessibility (data protection by default).

Boliden must ensure a level of security of processing that is appropriate to the risk.

Boliden must cooperate with the Swedish Data Protection Authority (Datainspektionen) in the performance of its tasks.

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In the drawing up of contracts, Boliden must, if applicable, ensure that there is a written data processing agreement that regulates the processor's processing of personal data.

5 BREACHES

Breaches of this policy must be reported to the DPO (Data Protection Officer) by phone or e-mail (dpo@boliden.com). It is important that the breach is reported as soon as possible.

6 DETAILED INFORMATION

For further information, see guidelines, instructions and tools in Management Manual.

7 POLICY AUDIT CHECK LIST

Compliance with this policy may be subject to an internal audit. In order to ensure compliance with the policy within your organisation, the following questions must be answered with 'Yes'.

1. Is there a data privacy coordinator appointed at your business unit?
2. Is personal data processed according to the principles set out in this policy?
3. Are there processes and routines for processing of sensitive personal data?
 - a. Are these processes documented?
 - b. Is there a visible audit trail?
4. Are the processes and routines in line with this policy?
5. Are all employees aware of this policy, the guidelines and the processes and routines?
6. Are breaches of this policy reported to your local data privacy coordinator?

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