

Online Privacy Policy

Zink Commodities's Commitment To Privacy

Your privacy is important to us. This Online Privacy Policy ("Privacy Policy") explains how we protect your privacy when you visit this Web site and the other Zink Commodities Web sites that display this Privacy Policy, or when you use any Zink Commodities digital application, such as a mobile app, that links to this Privacy Policy (collectively, our "Site(s)"). This Privacy Policy describes what types of information we gather and track when you use our Sites, how this information is used and with whom it is shared. If you have any questions about this Privacy Policy, please contact us.

This site is operated by the Zink Commodities company established in the country to which the content of the site is directed. This Zink Commodities company is referred to in this Privacy Policy as "Zink Commodities," "we," "us," and "our".

Scope of This Privacy Policy

This Privacy Policy covers the "Personal Information" we collect through our Sites.

"Personal Information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you personally, either alone or in combination with other information available to us. Examples of Personal Information include your name, contact details, credit card information, job applications, information you provide when you create an account or a personal profile on one of our Sites and information about the pages you have viewed and the path you have taken through our Sites.

Your Consent and other legal basis for using your Personal Information

Please take a few minutes to review this Privacy Policy. By accessing or using this Site, you are consenting to the collection, use and disclosure of your Personal Information as set forth in this Privacy Policy.

IF YOU DO NOT CONSENT TO THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION AS SET FORTH IN THIS PRIVACY POLICY, PLEASE EXIT AND DO NOT USE THIS SITE.

WHERE YOU HAVE THE RIGHT UNDER APPLICABLE LAW, SUCH AS IN THE EEA, THE UK OR ELSEWHERE, YOU MAY ALSO WITHDRAW YOUR CONSENT AT ANY TIME BY CONTACTING US. PLEASE NOTE THAT IN THE EVENT THAT YOU WITHDRAW YOUR CONSENT, WE MAY STILL BE REQUIRED OR PERMITTED BY LAW TO COLLECT, USE AND DISCLOSE SOME OR ALL OF YOUR PERSONAL INFORMATION.

We also collect, use and disclose your Personal Information where it is necessary for the performance of a contract with you or where it is necessary for our legitimate interests of operating, protecting, improving our business and for the other purposes set out in this Privacy Policy.

Changes to This Privacy Policy

As we add new features and functionality to our Sites, we may need to update or revise this Privacy Policy. We reserve the right to do so, at any time and without prior notice, by posting the revised version on our Sites. These changes will be effective as of the date we post the revised version on our Sites. They will apply only to the Personal Information we collect after we have posted the revised version. Your

use of one of our Sites following any such change constitutes your consent to the terms of the revised Privacy Policy. For this reason, it is important to review this Privacy Policy regularly.

Privacy Notices

This Privacy Policy may be supplemented or amended from time to time by “Privacy Notices” posted on our Sites. Generally, Privacy Notices provide details about the Personal Information we collect on particular pages or particular areas of a Site, why we need that information, and choices you may have about the ways we use that information.

Agreements Governing Your Use of Special Features and Password-Protected Areas of This Site

Some of our Sites include special features, such as licensed content or an online store, or password protected areas, such as a discussion forum, a chat room, a careers area, or a customers-only area.

When you sign up to use a special feature or password-protected area, you may be asked to agree to special terms governing your use of the special feature or password-protected area. In such cases, you will be asked to expressly consent to the special terms, for example, by checking a box or clicking on a button marked “I agree.” This type of agreement is known as a “click-through” agreement. If any of the terms of the click-through agreement are different than the terms of this Privacy Policy, the terms of the click-through agreement will supplement or amend this Privacy Policy, but only with respect to the matters governed by the “click-through agreement.”

What Personal Information Do We Collect Through Our Sites?

Information You Provide. We collect the Personal Information you knowingly provide (using your mouse and keyboard) when you use our Sites. The information we collect depends on how you use our Sites. For example, if you sign up to receive email communications from us, we collect your email address and any related information you provide. If you communicate with us using the “Contact Us” feature, we collect the information you provide when you complete the “Contact Us” form.

Generally, our Sites distinguish between information we need to provide you with a particular product, service or to fulfill your request (“mandatory fields”), and information that although useful is optional with respect to that particular product, service or your request. Please be aware that if you do not provide us with mandatory fields we will not be able to provide you with the product or service or to fulfill your request.

Supplemental Information. From time to time, we may supplement the information you give us with information from business partners, social media, or other sources. For example, we may obtain additional information to validate your address or information about your business. We may also supplement the information you give us with information we collect from you through other Zink Commodities Web sites, digital apps, or other channels. For example, if you are a Zink Commodities customer, we may supplement the information you provide online with information you provide in your other business dealings with Zink Commodities.

Information Sent to Us by Your Web Browser. We collect information that is sent to us automatically by your Web browser. This information typically includes your IP address, the identity of your Internet Service Provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. An “IP address” is a unique number that is automatically assigned to your computer when you connect to the Internet. It is used to identify your computer’s “location” in cyberspace, so that the information you request can be delivered to you. If you use a dial-up connection or a connection that assigns dynamic IP addresses, your computer will be assigned a new IP Address each time you connect to the Internet. If, however, your computer is permanently connected to the Internet using a static IP address, the IP address assigned to your

computer will generally be the same each time you use your computer. Although it does not identify you by name, we treat your IP address as your Personal Information.

You should be aware that when you respond to an electronic communication you receive from us, for example, by opening an email, downloading images or clicking on a link in an electronic newsletter, your browser tells us that you (or someone using your email address) have done so. We use this information to improve our marketing efforts. In addition, we review our server logs – which contain visitors' IP addresses – for security and fraud prevention purposes. If criminal activity is suspected, we may share our server logs and the Personal Information we have collected through this Site with the appropriate investigative authorities who could use that information to trace and identify individuals.

Device and Location Information. For digital app users, we may also collect information about the device you use to download the app, including, where available, the device's unique device identifiers, operating system, or mobile network information for system administration purposes. We may also automatically collect and store certain information in our server logs to get a better understanding of how people use the app, for system administration purposes, and to ensure we provide a good user experience and customer service. This type of information includes details about when, how, and what parts of the app you used, viewed and when you exited pages on the app as well as date or time stamps.

Cookies and Similar Technologies. A cookie is a small file sent by a Web site or digital app and stored on a user's computer which enables the Web site or digital app to remember information about you and your preferences. We use "cookies" and other Web technologies in a number of ways. For example, we may use these technologies:

- to collect information about the ways visitors use our Sites – which pages they visit, which links they use, and how long they stay on each page;
- to support the features and functionality of our Sites – for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits to our Sites;
- to personalize your experience when you use our Sites;
- to enable third parties (e.g. social media sites) to prepare online 'audiences' of its users who are either existing Zink Commodities customers or who share characteristics with Zink Commodities customers, subject always to that third party respecting your privacy settings;
- to 'recognize' you as someone who has visited a Zink Commodities website before or interacted with Zink Commodities online, so we may serve you with relevant ads as you browse elsewhere online, including third party websites; and
- to measure the success of our web or email advertising. For example, if you interact with an ad served by a third party on our behalf, we may receive non-identifying information, such as demographic information or general information about your interests.

Where required by applicable law.

The cookies we use can be classified into two categories:

- “Session cookies” which are allocated to your computer for the duration of your visit of our Sites and which will be automatically removed from your computer when you close your browser.
- “Persistent cookies” which expire after a reasonable period of time or until the user deletes the cookie.

Some of these uses may involve the use of “third party cookies”; that is, cookies that are set by software used by third parties, such as to carry out statistical analysis of page use, page interactions and paths through the site, or for the purposes of serving internet advertisements using an online advertising supplier. Third party cookies may collect information about your online activities over time and across different websites following your visit to our Sites.

Generally, the information collected using these Web technologies does not identify you by name. If, however, you have created a user identity, for example, by signing up to use a password-protected area on one of our Sites, we may link the information we collect using Web technologies to other information that identifies you personally.

If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. You may also delete our cookies as soon as you leave a Site. For more information on how to do so, please refer to your browser ‘help’ section or see <http://www.allaboutcookies.org> or <http://www.aboutcookies.org>. Although you are not required to accept our cookies when you visit our Sites, if you set your browser to reject cookies, you will not be able to use all of the features and functionality of our Sites.

Except as otherwise disclosed in this policy, we do not currently respond to web browser “do not track” signals or other mechanisms that indicate your preference for not having information collected over time and across different Web sites or digital apps following your visit to one of our Sites. If we do so in the future, we will describe how we do so in this Privacy Policy. Visit www.allaboutdnt.org to learn more.

How Does Zink Commodities Use Your Personal Information?

Generally we use the Personal Information we collect through our Sites

- to provide the products, information and services you request;
- for security, credit or fraud prevention purposes;
- to facilitate the safety of you or others;
- to provide you with effective customer service;
- to provide you with a personalized experience when you use our Sites;
- to display personalized advertising when you visit our Sites or a third party website;
- to contact you with special offers and other information we believe will be of interest to you;
- to contact you with information and notices related to your use of our Sites;
- to invite you to participate in surveys and provide feedback to us;
- to better understand your needs and interests;
- to improve the content, functionality and usability of our Sites;
- to improve our products and services;
- to improve our marketing and promotional efforts; and
- for any other purpose identified in an applicable Privacy Notice or other agreement between Zink Commodities and you.

To Whom Do We Disclose Personal Information?

We may share the Personal Information we collect through our Sites as described below:

Our Service Providers. We share Personal Information with companies and organizations, including subsidiaries and other business entities controlled by Zink Commodities, that perform services on our behalf, for example, companies that provide Web site or digital app support or online advertising services to us.

Within Zink Commodities. We may share your Personal Information within Zink Commodities (that is, among the business units within Zink Commodities) and with any of our affiliates where there is a “need to know” for the purposes set forth in this Privacy Policy.

Business Transactions. Zink Commodities may decide, for strategic or other reasons, to sell, buy, merge or otherwise reorganize one or more of its businesses. A transaction of this type may involve the disclosure of Personal Information to prospective purchasers.

Business Transfers. Your Personal Information may be transferred to a company that has acquired the stock or assets of Zink Commodities or one of our business units, for example, as the result of a sale, merger, reorganization or liquidation.

Compliance With Laws and Protection of Our Rights and the Rights of Others. We may disclose Personal Information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose Personal Information to prevent or investigate a possible crime, such as fraud or identity theft; to enforce or apply our online terms of use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

As Described in a Privacy Notice. We reserve the right to disclose your Personal Information as described in any Privacy Notice posted on the Web page or Zink Commodities digital app where you provide that information. By providing your Personal Information on that Web page or Zink Commodities digital app you will be consenting to the disclosure of your Personal Information as described in that Privacy Notice.

As Described in a Click-Through Agreement. We reserve the right to disclose your Personal Information as described in any click-through agreement to which you have agreed.

Your Choices

In some circumstances, we give you choices about the ways we collect, use and disclose your Personal Information. If so, we may ask you to indicate your choices at the time we collect your Personal Information. If you have created an account or a personal profile on one of our Sites, you may be able to update some or all of your privacy choices by changing the settings on your account settings or profile page at any time.

How Can You Access, Update or Correct Your Personal Information?

If you have created an account or a personal profile on one of our Sites, you may be able to access and update some or all of your Personal Information on your account settings or profile page. In most cases, however, you will need our help. If you wish to access, update or correct your Personal Information, please contact us. We will respond to you within a reasonable time and within the time limits established by applicable law. We may ask you for additional information to verify your identity. In most cases, we will provide access and correct or delete any inaccurate information you discover. In some cases, however, we may limit or deny your request if the law permits or requires us to do so or if we are unable to verify your identity.

Your Rights

In some circumstances, you have a right to request the erasure of your Personal Information or for a restriction on its use, to object to its use, to receive it in a portable format or to have it transmitted to another organization. You may also request that we no longer send you direct marketing

communications. If you wish to exercise any of these rights, please contact us using the contact details below.

How Long Do We Retain Your Information?

We may keep your Personal Information for as long as is necessary for our business purposes, and in particular to protect ourselves in the event of a legal claim. After this period, your Personal Information will be deleted or, in some instances, anonymized. If you subsequently withdraw your consent and we have no other lawful basis to continue processing your Personal Information, we will delete your Personal Information.

Security

Although we take commercially reasonable measures to protect the confidentiality, integrity and security of your Personal Information, we cannot guarantee the security of your Personal Information. For this reason, we urge users to take every precaution to protect their Personal Information while using the Internet.

Password Protection. Certain areas of our Sites are password protected. You are responsible for maintaining the confidentiality of your passwords. We have the right to assume that anyone accessing one of our Sites using a password assigned to you has the right to do so. You will be solely responsible for the activities of anyone accessing our Sites using a password assigned to you, even if the individual is not, in fact authorized by you. If you have reason to believe that your password has been compromised or used without authorization, you must promptly change it using the functionality provided on the Site.

Links to Other Zink Commodities Web Sites and Digital Applications

Zink Commodities operates many different Web sites and digital apps, each with its own content, features, and functionality. Each Zink Commodities Web site and digital app serves a different purpose. For this reason, not all of our Web sites and digital apps are governed by this Privacy Policy. When you use a link on one of our Sites to access another Zink Commodities Web site, take a minute to review the privacy policy posted on that Web site.

Links to Third-Party Web Sites

This Site may also contain links to Web sites operated by other companies, including websites operated by our third-party service providers, and unrelated third parties. This Privacy Policy does not apply to Personal Information collected on any of these other Web sites. When you access third-party Web sites through a link on one of our Sites, please take a few minutes to review the privacy policy posted on that site.

Children's Privacy

Our Sites are not directed at children under the age of 14. We do not use our Sites to knowingly solicit Personal Information from or market to children under the age of 14, or the relevant minimum age under applicable local legal requirements, except as permitted under applicable law.

International transfers

Zink Commodities is a global organization doing business in many countries and we may transfer your Personal Information across national borders for the purposes described in this Privacy Policy. Databases may be accessed by our staff (or staff of our service providers) located in other countries where they have a "need to know". Different countries have different privacy laws and requirements, and some, provide less legal protection for your Personal Information than others. Please know, however, that no matter where your Personal Information is collected, used, transferred or stored, if it was collected through our

Sites, it will be processed in accordance with this Privacy Policy and any privacy notices or click-through agreements that apply to you.

BY USING THIS SITE, YOU ARE CONSENTING TO THE COLLECTION, USE, AND TRANSFER OF YOUR PERSONAL INFORMATION IN ANY COUNTRY IN THE WORLD.

WHERE YOU HAVE THE RIGHT UNDER APPLICABLE LAW, YOU MAY WITHDRAW YOUR CONSENT AT ANY TIME BY CONTACTING US. PLEASE NOTE THAT IN THE EVENT THAT YOU WITHDRAW YOUR CONSENT, WE MAY STILL BE REQUIRED OR PERMITTED BY LAW TO COLLECT, USE AND DISCLOSE SOME OR ALL OF YOUR PERSONAL INFORMATION.

Contact us

If you have questions about this Privacy Policy or our privacy practices or if you wish to access, update, correct, or otherwise exercise your rights in regard to your Personal Information, please contact us via info@zinkcommodities.com .

Business Information Notice

This Notice explains how Zink Commodities as a data controller uses Personal Information about you in a business context if you are:

- a Supplier or if you represent an organization that is a Supplier;
- a Customer or if you represent an organization that is a Customer; or
- Web Users.

We refer to this as “Business Information.”

“Supplier” means a current or prospective vendor, supplier, subcontractor or partner of Zink Commodities. “Customer” means a customer, prospective customer or target customer of Zink Commodities. “Web User” means a user of a Zink Commodities internet website. “Third Party Service Provider” means a third party vendor or supplier outside Zink Commodities who may have access to Business Information in providing services to Zink Commodities. “Personal Information” means information relating to an identified or identifiable natural person that is processed by or on behalf of Zink Commodities by automatic means.

1. What Business Information does Zink Commodities collect?

The type of Business Information that Zink Commodities collects and uses depends on the particular business context and the purpose for which it was collected. It may include:

- contact details (such as your name, job title, gender, work address, telephone numbers, email address, fax numbers and so on);
- details of your relevant experience and/or academic and professional qualifications (for example, if you are employed by a vendor);
- details of your business and other interests and opinions (for example, where information is held in a Customer Relationship Management database);
- for Web Users, information relating to your use of the Zink Commodities website, including the content of web forms, contributions made to any discussion forums and browsing history, IP addresses and your path through the Zink Commodities website;
- credit card details, credit worthiness, and other financial-related information, such as your bank account number and other relevant payment-related information collected in support of a business transaction;
- CCTV images and visit information for visitors to Zink Commodities sites.

2. What will Zink Commodities do with your Business Information?

Generally, Zink Commodities only uses Business Information for one or more of business-related purposes below:

- Negotiating, concluding and performing contracts with Customers (including the provision of financial services and advice);
- Managing Zink Commodities accounts and records;
- Advertising, marketing and public relations (including direct marketing);
- Market Research and analysis;
- Negotiating, concluding and performing contracts with Suppliers;

- Communicating with Individuals that are, or who represent, Customers, Suppliers or Web Users;
- Operating the Zink Commodities website, including the use of analytics software;
- Supporting Zink Commodities's corporate social responsibility activities;
- Facilitating the security of Zink Commodities sites, websites and other assets;
- Facilitating the safety of you or others;
- Legal and regulatory compliance and internal control evaluations and audits (including where conducted by Zink Commodities's internal and external audit service providers);
- Debt administration; and/or
- Obtaining legal advice, including for legal proceedings and litigation and also in connection with the sale, purchase or merger of a business.

We process Business Information for the above purposes as necessary for our legitimate business interests and those of third parties that we interact with. Certain aspects of our processing are also necessary for us to comply with the law or are based on your consent, or other available legal grounds for processing.

3. Zink Commodities data privacy principles

Zink Commodities observes the following principles in relation to Business Information:

- We process it fairly and lawfully;
- We process it for a specific legitimate business purpose and do not process in a manner incompatible with that purpose without your knowledge and/or consent;
- We use Business Information that is adequate, relevant and not excessive for the purpose for which it is processed;
- We keep it accurate and, as necessary, up to date;
- We keep it in a form which permits identification for no longer than necessary for the purpose for which it was collected;
- We protect it against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, using appropriate technical and organizational measures;
- We process it in accordance with an Individual's rights;

4. Who is your Business Information disclosed to?

(a) Within Zink Commodities

Zink Commodities restricts access to Business Information to people within the company who have a "need to know" that information. As a global company doing business across national borders and with certain shared services and resources, there are many situations where this "need to know" requires your information to be transferred to Zink Commodities in another country, including countries that may provide no legal protection for Personal Information. However, the purpose of the Zink Commodities Data Privacy

for Business Information Policy is to ensure protection for your Business Information in every country where Zink Commodities does business based upon it being approved by the relevant local Data Privacy Authority as 'Binding Corporate Rules'.

(b) Outside Zink Commodities

Zink Commodities shares Business Information with authorized Third Party Service Providers. Where it does so, Zink Commodities imposes appropriate contractual obligations regarding Business Information on such Third Party Service Providers.

Beyond its Third Party Service Providers Zink Commodities will only disclose your Business Information to third parties outside Zink Commodities:

- when required to do so by law;
- in response to a legitimate request for assistance by the police or other law enforcement agency;
- to protect an individual's vital interests or safety;
- to seek legal advice from Zink Commodities's external lawyers or in connection with litigation with a third party;
- in connection with the sale, purchase or merger of a business; or
- to engage external auditors to validate Zink Commodities's financial accounts.

When doing so, your Business Information may be transferred to other countries which do not provide the same level of legal protection as in your own country. However, it is our practice to apply appropriate safeguards to protect your Business Information.

5. Exercising your rights

(i) Web Users, Customers and those representing Customers

If you would like a copy of any of your Business Information or if you would like to update or correct it or you would like to request Zink Commodities to stop sending you marketing materials either generally or via a particular media, please contact Zink Commodities. However, please note that we may continue to send you non-marketing communications (such as service related communications), and that we will keep a record of your request as well as your contact details to ensure that your request is respected.

If you have a concern about how Zink Commodities has used your Business Information, as a first step, you should raise the concern in writing to the Zink Commodities business with which you do business.

In some circumstances, you have a right to request the erasure of your Business Information or a restriction to its use, to object to its use, to receive it in a portable format or to have it transmitted to another organization. If you wish to exercise any of these rights, please contact Zink Commodities.

(ii) Suppliers and those representing Suppliers

If you would like a copy of any of your Business Information or if you would like to update or correct it, please contact Zink Commodities.

If you have a concern about how Zink Commodities has used your Business Information, as a first step, you should raise the concern in writing to the Zink Commodities business with which you do business.

6. Retaining your Business Information

Depending on the purposes for which we are processing your Business Information, we may keep your Business Information for as long as is necessary for these purposes, and in particular to protect ourselves in the event of a legal claim. Limitation periods for bringing claims vary across jurisdictions.

Contact Zink Commodities

If you have questions about this Notice or our privacy practices, or if you wish to access, update, correct, or otherwise exercise your rights in regard to your Business Information, including withdrawing your consent, please send your e-mail to us: info@zinkcommodities.com .