



AA Sakatti Mining Oy Stakeholder Register Privacy Notice

This privacy notice describes AA Sakatti Mining Oy's stakeholder register. The register contains personal data related to managing stakeholder relationships.

Prepared in accordance with Articles 13 and 14 of the European Union (EU) General Data Protection Regulation (EU) 2016/679.

1. Controller and Contact Person

Name	AA Sakatti Mining Oy
Address	Tuohiaavantie 2, 99600 Sodankylä
Business ID	2436768-3
Contact Person	Ulla Syrjälä
Email	ulla.syrjala@angloamerican.com

2. Name of the Register

Stakeholder Register

3. Purpose and Legal Basis for Processing Personal Data

The purpose of processing personal data is to manage stakeholder relationships necessary for the controller's operations. Personal data is also used for communication, informing about events, sending invitations, and conducting surveys and inquiries.

The legal basis for processing is the controller's legitimate interest, which is based on a customer, cooperation, or other significant relationship between the controller and the data subject. These individuals are representatives of important stakeholders and are included in the register due to their position, job role, or other relevant stakeholder connection.

Individuals may also have expressed willingness to receive newsletters or other stakeholder communications, in which case the collection of contact details is based on consent. Event participant lists are used for purposes such as informing about public events, monitoring attendance numbers, and collecting feedback.

The controller may also have a direct contractual or similar relationship with the data subject or their organization (e.g., landowners). Processing these details is justified both by legitimate interest and by statutory obligations related to environmental impact assessments.

Additionally, personal data is used for submitting activity notifications under Section 8 of the Transparency Register Act, where the legal basis is compliance with statutory obligations.

The stakeholder Register's privacy notice also includes a separate newsletter register. The newsletter is delivered based on the contact details contained in this newsletter register. Personal data is collected for the newsletter register on the basis of separate consent, and the register includes only those individuals who have agreed to subscribe to the newsletter. The personal data in the newsletter register is used solely for the purpose of distributing the newsletter.

4. Data Content of the Register

Personal details (first name, last name, phone number, email address, home address)

Organization represented by the person (name) and title

Additional information related to stakeholder relationship management, such as:

- Stakeholder category (e.g., authorities, research institutions)
- Level (e.g., local, regional, national)
- Details of interactions with the person (e.g., meetings, discussions) and their dates

5. Sources of Data

Data is primarily collected from the data subject or during interactions with them. Contact details of authorities are obtained from publicly available sources.

Personal data may also be collected from other publicly available sources.

6. Retention Period of Personal Data

AA Sakatti Mining processes personal data as long as the person acts as a contact in a customer relationship or as a member of a stakeholder group. Data in the stakeholder register is retained as long as necessary for the defined purpose, such as fulfilling statutory obligations related to environmental impact assessments.

The necessity of the data is reviewed annually. When there is no longer a legal obligation or legitimate interest for processing, unnecessary contact details are deleted during the next annual review.

The personal data in the newsletter register is retained for as long as necessary for delivering the newsletter (until the subscription is cancelled or the newsletter service is discontinued).

7. Disclosure of Data

The controller does not intentionally disclose personal data from the stakeholder register to third parties, except as required by the Transparency Register Act or other legislation. Data may also be processed by companies within the same group when handled in shared systems. Third parties acting on behalf of the controller, such as IT system providers, may participate in processing.

The controller has agreements in place as required by data protection regulations. Personal data is primarily processed on servers located in the EU, but may be processed outside the EU, in which case

the controller ensures data protection through agreements (e.g., EU Commission-approved standard contractual clauses) and other necessary measures.

8. The Right of Access and Rectification

Data subjects have the right under the GDPR to check what data has been stored about them and to request correction or deletion of data (requests will be fulfilled unless there is a legal basis to refuse). Requests should be sent to **Sakattiinfo@angloamerican.com**. Data will be provided at an agreed time at the company's Sodankylä office, in person, upon presentation of identification.

9. Other Rights Related to Personal Data Processing

The data subject has the following rights:

- Right to request restriction of processing
- Right to object to processing
- Right to withdraw consent if processing is based on consent (withdrawal does not affect prior processing)
- Right to rectification
- Right not to be subject to automated decision-making or profiling

10. Appealing to the Supervisory Authority

If the data subject believes that the processing of personal data violates applicable legislation or infringes upon their statutory rights, they may lodge a complaint with the Data Protection Ombudsman.