



## PRIVACY POLICY

This privacy policy (this “Policy”) applies to the website [www.iofina.com](http://www.iofina.com) (the “Website”) owned and operated by Iofina plc (“Iofina” or the “Company”). This Policy describes how Iofina collects and uses the personal information you provide on the Website. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

### About Us

Iofina focuses on the exploration and production of iodine and halogen-based specialty chemical derivatives. The Company’s business strategy is to identify, develop, build, own and operate iodine extraction plants currently focused in North America. Iofina’s aim is to provide useful, simple and straightforward information about the business through the Website.

### 1. Scope of Policy

This Policy sets out the basis on which any personal data Iofina (“we”, “our” or “us”) collect from you, or that you provide to us, will be processed and used by us. This includes data provided directly to us, through your use of the Website and through your enquiring and/or attending an investor event in person or through a web or telephone interface (“Events”).

#### 1.1 Controller

We are the data controller responsible for your personal data.

#### 1.2 Data Controller

We have appointed a Data Controller who has a number of important responsibilities including:

- (a) monitoring compliance with the General Data Protection Regulations 2018 (“GDPR”) and other data protection laws;
- (b) raising awareness of data protection issues, training staff and conducting internal audits; and
- (c) co-operating with supervisory authorities such as the Information Commissioner’s Office (“ICO”) on our behalf.

If you have any questions about this Policy, including any requests to exercise your legal rights, please contact us directly.

#### 1.3 Complaints

You have the right to make a complaint at any time to the ICO, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us directly in the first instance.

So that we are clear and there is no misunderstanding about how we handle your personal data, we will:

- (a) always keep your data safe and private;
- (b) never sell your data; and
- (c) allow you to review your consent at any time.

## **2. Cookies**

We use cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you use the Website and also allows us to improve the Website.

## **3. Information we collect about you**

We will collect and process the following data about you:

- (a) Information you give us (“Submitted Information”): This is information you give us about you by filling in forms on the Website, or by corresponding with us (for example, by email). It includes information you provide when you register for Events, request information, subscribe to any of our newsletters, participate in social media discussions, enter a survey and when you report a problem with the Website. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, email address, phone number and any other information you provide us.
- (b) Information we collect about you and your device. Each time you visit the Website we will automatically collect the following information:
  - technical information, including the internet protocol (“IP”) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information and the type of mobile device you use, a unique device identifier (for example, your device’s IMEI number, the MAC address of the device’s wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting (“Device Information”); and
  - information about your visit, including the full uniform resource locators (“URL”), clickstream to, through and from the Website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, device information.
- (c) Location Information. We may use your IP address to determine your location.
- (d) Information to help us deliver our service to you. We work closely with third parties in order to help us deliver our service to you. These third parties are business partners such as those we partner with to offer additional services such as co-hosting events, sub-contractors in technical support, analytics providers, search information providers and service providers. Information we may collect about you from such parties can include information which helps us to verify your identity.

- (e) If you allow us to, we will collect information from third parties such as Twitter, LinkedIn and Google.

#### **4. Uses made of the information**

Below is a summary of the key types of data that we make use of. For more information on how these types of data are used and for which purposes, please see the table below.

We use information held about you in the following ways:

- (a) Submitted Information: We will use this information:

- to provide you with requested information or information about Events;
- answer questions or contact you about potential business or sales enquiries;
- to verify your identity to confirm your eligibility to attend Events;
- to notify you about news; and
- to ensure that content from the Website is presented in the most effective manner for you and for your computer.

- (b) Device Information: We will use this information:

- to administer the Website for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve the Website to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep the Website safe and secure;
- to measure or understand the effectiveness of any advertising we serve to you and others, and to deliver relevant advertising to you;
- to verify your identity to confirm your eligibility to attend Events; and
- to comply with our regulatory obligations.

- (c) Location Information: We will use this information:

- to deliver relevant advertising to you; and
- to protect against fraud.

- (d) Third Party Information: We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this Policy for as long as it is combined.

If we decide to engage advertisers to promote Events, the advertisers and their advertising networks may require anonymised personal data to serve relevant adverts to you and others. We will never disclose identifiable information about individuals to advertisers, but we may provide them with aggregate information about our users. We may also use such aggregate information to help our advertising partners provide a tailored and targeted campaign, relevant for a sub-section of our users. In some instances, we may use personal data we have collected from you to enable our advertising partners to display their advertisement to their target audience.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we use your personal data as stated above, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>What we use your information for</b>	<b>Type of Information</b>	<b>Our reasons</b>	<b>Our legitimate interests</b>
<b><i>To help market Events that interest you:</i></b>			
To provide you with information about other Events we offer that are similar to those that you have already attended or enquired about;	Submitted Information. Device Information.	Our legitimate interests.	Developing Events for existing attendees and any applicable fees in relation to them.
To provide you information about products or services and determine potential new business	Third Party Information.		Defining types of attendees for new Events. Sales of products and business development
To provide you, or permit selected third parties to provide you, with information about Events we feel may interest you;			Being efficient about how we fulfil our legal and contractual duties. Seeking your consent when we need it to contact you.
To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;			

To make suggestions and recommendations to you and other users of the Website about Events that may interest you or them; and

To process applications for Events available through us including making decisions about whether to approve attendance.

***To keep the Website and Events running:***

To administer the Website for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; to ensure that content from the Website is presented in the most effective manner for you and for your computer;

To allow you to attend Events when you choose to do so; and

To notify you about changes to Events; and as part of our efforts to keep the Website and the safe and secure.

***Facilitate social interactions:***

To facilitate social interactions at Events.

Submitted Information.  
Device Information.

Fulfilling contracts; our legitimate interests; and our legal obligations.

Being efficient about how we fulfil our legal and contractual duties.  
Complying with regulations that apply to us.

To facilitate social interactions at Events.

Submitted Information.  
Device Information.  
Location Information.

Our legitimate interests.

Developing new Events or enhancing existing Events.

Being efficient about how we fulfil our legal and contractual duties.  
Seeking your consent when we need it to contact you.

## **5. What do we mean when we say:**

### **5.1 Legitimate interest**

This means the interest of ours as a business in conducting and managing our business to enable us to provide to you with access to the Website and Events and to offer the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

### **5.2 Fulfilling a contract**

This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

### **5.3 Our legal obligation**

This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **6. Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **6.1 Promotional offers from us**

We may use your personal data (such as your Submitted Information or Location Information) to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which Events may be relevant for you.

You will receive marketing communications from us if you have signed up to and/or use the Website and, in each case, you have specifically opted in to of receiving marketing notifications.

### **6.2 Third-Party marketing**

We will obtain your express opt-in consent before we share your personal data with any company outside the Iofina plc group of companies for marketing or promotional purposes.

### **6.3 Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us directly.

## **7. Disclosure of your information**

### **Data processing partners**

We will disclose the data we collect from you to certain third parties who use personal data in delivering their services to us, they use data securely and confidentially and under strict contractual controls in accordance with GDPR and any other data protection laws and enforced by Iofina.

We send personal data to the following sets of data processors:

- (a) Cloud storage providers

This is in order to safely and securely store your data with us.

- (b) Advertisers and analytics providers

If we decide to engage advertisers to promote our products and services, the advertisers and their advertising networks may require anonymised personal data to serve relevant adverts to you and others. We will never disclose identifiable information about individuals to advertisers, but we may provide them with aggregate information about our users. We may also use such aggregate information to help our advertising partners provide a tailored and targeted campaign, relevant for a sub-section of our users. In some instances, we may use personal data we have collected from you to enable our advertising partners to display their advertisement to their target audience. We also use analytics and search engine providers that assist us in the improvement and optimisation of the Website.

- (c) Companies within our group

In order to provide a unified service across all of our products and services, we may disclose your personal information to any member of our group, which means any of our subsidiaries or related entities. Companies in our group will be acting as joint controllers or processors.

We may also disclose your personal information if Iofina is or substantially all of its assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.

In order to:

- (a) enforce any agreements between you and us or to investigate potential breaches; or
- (b) protect the rights, property or safety of Iofina or others. This includes exchanging information with other companies and organisations.

## **8. Third party services partners**

**8.1** From time-to-time, we may partner with certain third parties in order to offer you co-hosted Events or promotional offers. In order to provide these services to you and to allow us and any associated third party to optimise their/our offering to you, we will share some of your personal data with such third parties. We will obtain your express opt-in consent before we share your personal data with any company outside of our group of companies for these purposes.

**8.2** You can withdraw your consent at any time after giving your explicit opt-in consent by contacting us directly.

## **9. Storage security and international transfers**

- 9.1** The data that we collect from you will be transferred to, and stored at, destinations both inside and outside the European Economic Area (“EEA”). As we provide an international service your data may be processed outside of the EEA. We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.
- 9.2** All information you provide to us is stored on secure servers.
- 9.3** Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 9.4** Certain services include social networking, chat room or Q&A features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

## **10. Retaining your information**

We are obligated to not hold your information for longer than is strictly necessary and we will not hold any of your personal data for longer than is required.

## **11. Your legal rights**

### **11.1 You have rights under GDPR and any other applicable data protection laws in relation to your personal data**

Please see below to find out more about these rights:

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you. If you require this, please contact us directly.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, please contact us directly.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data. This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your particular

situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, your personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. If you require this, please contact us directly.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

### **11.2 No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **11.3 What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **11.4 Time limit to respond**

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **11.5 If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

## **12. Changes to Privacy Policy**

Any changes we may make to our privacy policy in the future will be posted on this page.

### **13. Contact**

All questions relating to data and your privacy are welcomed. Please contact us directly using the following method:

Email: [information@iofina.com](mailto:information@iofina.com)

Telephone: +44 (0)20 3006 3135

*This policy was last updated on and was effective from 19 September 2018*