



EUROPEAN METALS PRIVACY INFORMATION NOTICE

Last Updated: September 2025

1. Introduction

European Metals (hereinafter also referred to as “we”, “us”, “our”) is committed to protecting the privacy of our members, partners and website visitors. This policy explains how we collect, use, and safeguard your personal data.

2. Who We Are

We are a non-profit trade association representing the non-ferrous metals industry in Europe. Our registered office is located at Avenue de Tervueren 168, Box 13, 1150 Brussels and we are registered in the CBE under the n° 1027.205.947.

For any privacy-related inquiries, you may contact us at tonut@european-metals.eu.

3. What Data We Collect

We may collect various types of Personal Data, either directly from you as a member or partner or automatically through third-party services. These include:

- **Personal identifiers** such as name, job title, and organization
- **Contact information**, including email address, phone number, and postal address
- **Membership and transaction records** such as membership status and payment history
- **Event engagement data**, including participation details and expressed preferences
- **Website usage data**, which may be automatically collected and include:
 - IP address, domain name and browser type
 - Operating system and device specifications
 - URI addresses (Uniform Resource Identifier)
 - Time and method of requests, server responses, and file sizes
 - Navigation behaviour, including time spent on pages and click paths
 - Country of origin and other environment-related metrics

Personal Data may be freely provided by Users, or automatically collected during use of our Website. Unless explicitly stated as optional, all requested data are considered mandatory and are essential to providing our services. In cases where it's specifically stated that some Data are not mandatory, Users are free not to communicate these Data without consequences to the availability or the functioning of the service. Users unsure about what data is required may contact us for clarification.



4. Place of processing

The Data are processed at our registered offices and in any other places where the parties involved in the processing are located.

Data are not transferred outside the EEA, except in accordance with GDPR, namely by establishing Standard Contractual Clauses that ensure data protection obligations are upheld by both sender and recipient or to countries that fall under adequacy decisions adopted by the European Commission. To find out more about the place of processing of such transferred Data, Users can check the section containing details about how we use Data below.

5. How We Use Data

Personal Data are collected and used for the following purposes:

- Service Provision: to enable and maintain access to our services, features, and membership functionality
- Legal Compliance and Requests: to fulfil legal obligations including filing and publication formalities and UBO registration formalities under Belgian law, respond to enforcement requests, and cooperate with authorities where required
- Rights and Interest Protection: to defend or protect our rights and interests, or those of Users or third parties, including cases of disputes and security threats
- Fraud Detection and Security Monitoring: to detect malicious or fraudulent activity and maintain the integrity of our systems
- Website Analytics: to analyse traffic and usage patterns for site optimization using services such as:
 - *Google Analytics* (Ireland): tracks user behaviour and may personalize advertising across Google's network
- Content Display from External Platforms: to visually enhance our site using third-party content and tools such as:
 - *Google Fonts, Font Awesome, YouTube Widgets* (United States): may collect usage and tracker data even if not actively used.
- Social Media Integration: to allow interaction with external social networks like:
 - *LinkedIn Social Widgets* and *Twitter Buttons* (United States), subject to your privacy settings on those platforms.
- Legal purposes: the User's Personal Data may be used for legal purposes by the Owner in court or in the stages leading to possible legal action arising from improper use of the Website or the related Services. The Owner may be required to reveal personal data upon request of public authorities.
- System logs and maintenance: for operation and maintenance purposes, our Website and any third-party services may collect files that record interaction with our Website (System logs) or use other Personal Data (such as the IP Address) for this purpose.



6. Legal Basis for Processing

We process personal data based on one or more of the following legal grounds:

- **Consent:** Users have provided their explicit consent for one or more specific purposes.
- **Contractual necessity:** provision of data is necessary for the performance of an agreement with the User (e.g. membership agreements) or to take steps at the Users' request before entering into such an agreement.
- **Legal obligations:** processing is necessary to comply with a legal requirement to which the Owner is subject.
- **Public interest or official authority:** processing is carried out in the public interest or in the exercise of official authority vested in the Owner.
- **Legitimate interests:** processing is required for purposes related to our legitimate interests or those of a third party such as member relationship management, industry representation and advocacy and direct marketing to members.

If Users are uncertain about the specific legal basis that applies to their personal data, including whether the provision of data is a statutory or a contractual requirement, they are welcome to contact us for clarification.

7. Data Sharing

In addition to the Owner, in some cases, the Data may be accessible to designated personnel, involved with our operations such as administration, sales, marketing, legal, system administration or external parties appointed, if necessary, as Data Processors by us, such as third-party technical service providers, mail carriers, hosting providers, IT companies.

Users may request a current list of these parties at any time.

8. Data Retention

Personal data is retained only as long as necessary to fulfil the purposes for which it was collected, in accordance with legal, regulatory, and accounting requirements. Specific retention periods depend on the legal basis for processing:

- **Contractual necessity:** data collected to fulfil an agreement with the User will be retained until that agreement has been fully performed.
- **Legitimate interests:** data collected for the Owner's legitimate interests will be stored as long as needed to fulfil those purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.
- **User consent:** where Users have provided consent for extended retention, data may be stored until such consent is withdrawn.
- **Legal obligation or authority order:** data may be retained longer if required by law or upon order of an authority.



After the applicable period expires, Personal Data will be securely deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

For more information about applicable retention periods or specific legal bases, Users are welcome to contact us.

9. Users' Rights

As a User, you are entitled to exercise a number of rights concerning your Personal Data, in accordance with the General Data Protection regulation (GDPR), to the extent permitted by law. These include:

- **Right to Access:** Users have the right to learn if Data is being processed by the Owner, gain insight into how it is used and receive a copy of your Personal Data.
- **Right to Rectification:** Users have the right to verify the accuracy of their Personal Data and request corrections or updates where necessary.
- **Right to Erasure:** Users may request that their Personal Data be deleted.
- **Right to Restriction of Processing:** Users have the right to restrict the processing of their Data, in which case it will only be stored and not otherwise processed.
- **Right to Data Portability:** Users have the right to receive their Personal Data in a structured, commonly used, and machine readable format and, if technically feasible, have it transmitted to another controller without any hindrance.
- **Right to Object:** Users have the right to object to the processing of their Personal Data if the processing is carried out on a legal basis other than consent. Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection. If their Personal Data is being processed for direct marketing purposes, Users may object to that processing at any time, free of charge and without providing any justification. The Personal Data will then no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.
- **Right to Withdraw Consent:** Users may withdraw previously given consent for processing their Personal Data at any time.
- **Right to Lodge a Complaint:** Users have the right to file a complaint with their competent data protection authority.

To exercise any of these rights, please contact us at tonut@eurometaux.be . Such requests are free of charge and will be answered as early as possible and always within one month, providing Users with the information required by law. Where applicable, we will also inform relevant third parties of any corrections, erasures, or rectifications, unless doing so proves impossible or requires disproportionate effort. Upon request, we will gladly share information about these recipients.



10. Security

The Owner takes appropriate security measures in line with market standards to prevent unauthorized access, disclosure, modification or unauthorized destruction of the Data.

Users are entitled to learn about the security measures taken by the Owner to safeguard their Data.

11. Changes to This Policy

The Owner reserves the right to change or update this privacy policy at any time. Any changes will be communicated either via direct communication or by posting the updated policy on our website and, when technically and legally feasible, via notifications sent through available contact channels. We encourage Users to review our website regularly and to note the date of the latest revision listed above.

If changes involve processing activities based on User consent, the Owner will seek renewed consent where legally required.

12. Definitions and Legal References

- **Data Subject:** The natural person to whom the Personal Data refers.
- **Data Processor (or Processor):** The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller, as described in this privacy policy.
- **Data Controller (or Owner):** The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of our website. The Data Controller/Owner, unless otherwise specified, refers to European Metals asbl.
- **EEA:** refers to all member states of the European Union (EU), plus three of the four European Free Trade Association (EFTA) countries, namely: Iceland, Liechtenstein, and Norway
- **European Union (or EU):** Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.
- **Personal Data (or Data):** Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.
- **Service:** The service provided by us.
- **Usage Data:** Information collected automatically through our website (or third-party services employed in our website), which can include: the IP addresses or domain names of the computers utilized by the Users who use our website, the URI addresses (Uniform



Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

- **User:** The individual using our services and/or website who, unless otherwise specified, coincides with the Data Subject.