



Toyota Tsusho Metals Limited

("the Firm")

Privacy Notice

1. INTRODUCTION

This privacy notice sets out the approach taken by Toyota Tsusho Metals ("TTM" or "the Firm") when collecting and processing personal data pursuant to the General Data Protection Regulation ("GDPR"), which is supplemented by the Data Protection Act 2018.

TTM provides services to companies and organisations but, in the course of business, it may obtain personal information about individuals. It is therefore important to TTM that personal data is processed and protected in accordance with the law.

2. DATA PROTECTION TERMS

2.1 Data Subject and Personal Data

A "data subject" is a natural person (an individual), which is distinct from a legal person (for example, a company) and can be identified by their personal data. This is information that can identify a data subject, such as name, identification number, location data or one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity of that data subject.

2.2 Data Controller

TTM is a data controller which means that it determines the purposes and means of the processing of personal data.

2.3 Data Processor

A data processor is any legal or natural person which processes personal data on behalf of TTM.

3. RIGHTS OF DATA SUBJECTS

Data subjects have a number of rights under GDPR relating to their personal data such as having the right to:

- access their personal data by making a 'subject access request' – see below for further information
- have personal data corrected if it is wrong or, in certain circumstances, have it deleted
- have the processing of personal data restricted (in the event that TTM needs to verify or investigate a data subject's concerns)
- object to the processing of personal data in certain circumstances, including the right to object to marketing
- request that TTM moves personal data elsewhere (data portability)
- withdraw any consent that a data subject has given to TTM if it is processing personal data only because the data subject has given that consent



- have personal data automatically processed

Subject access requests should be dealt with by TTM within one month of receipt of the request unless the request is particularly complex, in which case it may take longer but the data subject will be notified of any delay. The request should be provided free of charge unless the request is repetitive, excessive, or clearly unfounded.

4. HOW TTM USES, RETAINS AND PROTECTS PERSONAL DATA

4.1 Data Protection Principles

TTM must ensure that the personal data it processes is:

- processed lawfully, fairly and in a transparent manner
- collected for lawful purposes that are clearly specified and only further processed for compatible purposes
- relevant and limited to what is necessary for the purposes of the processing
- accurate and kept up-to-date, with inaccurate personal data being erased or rectified without delay
- kept for no longer than is necessary
- processed in a secure manner, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage

To process personal data lawfully, TTM must ensure that one of the following applies:

- The data subject has provided consent
- Processing is necessary for the:
 - performance of the contract
 - compliance with a legal obligation
 - protection of the vital interests of the data subject
 - performance of a task carried out in the public interest
 - legitimate interests of the data controller except where such interests are overridden by the interests and fundamental rights of the data subject

4.2 How TTM Uses Personal Data

TTM will process personal data in accordance with the data protection principles set out above. The reasons that TTM will process personal data include, but are not limited to:

- Conducting due diligence
- Monitoring, detecting and investigating financial crime
- Credit and financial checks
- Providing or receiving services and/or for the performance of a contract TTM has entered, or is about to enter, into
- Complying with TTM's regulatory requirements
- When it is received from a data subject as part of being an employee/contractor/agent or potential employee/contractor/agent of TTM

If TTM shares your personal data, it will require other parties to ensure that personal data is secure and processed in accordance with the standards of GDPR. If personal data is shared outside the European Economic Area (EEA), TTM undertakes that the receiving party ensures a similar degree of protection will be afforded to personal data as if it was being transferred within the EEA. This is achieved by transfers taking place to countries which have been classified by the European Commission as having an adequate level of protection for data



subjects and/or having in place contracts which ensure that both parties act in a manner consistent with GDPR.

4.3 How TTM Retains Personal Data

The GDPR principles state that personal data can be kept for no longer than is necessary for the purposes of which the personal data are processed. This means that TTM's retention periods for holding personal data are subject to its arrangement with the data subject (or the organisation with whom TTM contracts) and the holding period required to provide services and/or fulfil TTM's legal obligations. For specific details on TTM's retention periods, please contact us using the details set out below. Retention periods are kept under review.

4.4 How TTM Protects Personal Data

TTM has controls in place to ensure that personal data is securely held and safe from unauthorised processing, unlawful processing, accidental loss, destruction, or damage. Access to personal data is limited to those who need to access it and those individuals or organisations processing on TTM's behalf are subject to a duty of confidentiality and contractual terms which specify strict adherence to data protection law.

5. WHO TO CONTACT

5.1 TTM

Any requests, in relation to a data subject's rights or any data protection queries, should be sent to:

- In writing: Compliance Department, Toyota Tsusho Metals Limited, 88 Wood Street, London EC2V 7DA
- By e-mail: compliance@ttmetals.com
- By phone: +44-(0)20-7776-3100

TTM may require further information in order to confirm the identity of the requesting party and their right to access the personal data.

5.2 Information Commissioner's Office

TTM will notify the Information Commissioner's Office (ICO) without undue delay and, where feasible, no later than 72 hours after becoming aware of any breaches which are likely to result in a risk to the rights and freedoms of a data subject.

If a request or concern is not satisfactorily resolved by TTM, it may be appropriate to approach the local data protection regulator, which for the UK is:

- In writing: Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- By phone: 0303 123 1113 (local rate)
- Via their website: <https://ico.org.uk/global/contact-us/email/>