
PRIVACY NOTICE

Tungsten West

How we collect, use and protect your personal data

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DATA CONTROLLER

Who we are

Tungsten West plc is a company registered in England and Wales (Company No. 11310159). Our registered office is at First Floor St. James House, St James Square, Cheltenham, Gloucestershire, GL50 3PR. We are the data controller for the personal information we collect and use as described in this notice.

For any questions about this notice or how we handle your personal data, please contact us via the contact form on our website at tungstenwest.com or by writing to us at the registered office above.

We are registered with the Information Commissioner's Office (ICO) as a data controller.

SCOPE

What this notice covers

This notice explains what personal data Tungsten West plc and, where relevant, any relevant group companies collect about you, why we collect it, how we use it, who we share it with, how long we keep it, and what your rights are. It applies to visitors to our website, people who enquire about our services, clients, suppliers, and anyone else whose personal data we process.

DATA COLLECTION

What personal data we collect

Depending on how you interact with us, we may collect:

- **Identity data** — name, job title, company name
- **Contact data** — email address, telephone number, postal address
- **Technical data** — IP address, browser type, device information, pages visited, time spent on site (collected automatically via cookies and similar technologies)
- **Usage data** — information about how you use our website
- **Communications data** — records of correspondence with us by email, phone, post, or online form
- **Business relationship data** — information relevant to managing supplier, contractor, investor or community relationships

We do not knowingly collect data from or about children under 16. If you believe we have inadvertently done so, please contact us immediately.

COLLECTION METHODS

How we collect your data

We collect personal data in the following ways:

- Directly from you when you fill in forms on our website or otherwise, contact us by email, phone or post, or sign up to receive communications from us
- Automatically as you interact with our website, via cookies and similar technologies (see the Cookies section below)
- From third parties, including publicly available sources, our group companies, or business partners where relevant to our services

LAWFUL BASIS

Why we use your data and our lawful basis

Under UK GDPR, we must have a lawful basis for processing your personal data. The table below sets out what we use your data for and the legal basis we rely on:

Purpose	What we use your data for	Lawful basis
Enquiries & communications	Responding to enquiries and providing information about our services	Legitimate interests
Contracts & procurement	Managing contracts with suppliers, contractors and service providers	Performance of a contract
Investor & shareholder comms	Communicating with shareholders, prospective investors and analysts in connection with the Company's AIM listing and activities	Legitimate interests / Legal obligation
Direct marketing	Sending you news and updates by email where you have opted in	Consent
Website analytics	Analysing website usage to improve our digital presence and user experience	Legitimate interests
Legal & regulatory compliance	Complying with legal and regulatory obligations, including as an AIM-listed company and holder of environmental and mining permits	Legal obligation
Security & fraud prevention	Preventing fraud and ensuring the security of our systems and services	Legitimate interests

Legitimate interests: Where we rely on legitimate interests, we have assessed that our interests are not overridden by your rights. You have the right to object to this processing — see Your Rights below.

Consent: Where we rely on consent (for direct marketing), you can withdraw it at any time by clicking the unsubscribe link in any marketing email, or by contacting us directly. Withdrawal does not affect the lawfulness of any processing already carried out.

DATA SHARING

Who we share your data with

We may share your personal data with:

- **Other companies within the Tungsten West group**, where necessary to provide services or for internal administration
- **Service providers** acting as data processors on our behalf — for example, IT and hosting providers, email platforms, and analytics services. These providers are contractually bound to handle your data securely and only for the purposes we specify
- **Professional advisers** — including lawyers, accountants, auditors, and insurers where necessary
- **Regulators and public authorities** — including HMRC, the FCA, the London Stock Exchange, and law enforcement, where we are required or permitted by law
- **Prospective buyers or investors** in the event of a merger, acquisition, or sale of all or part of our business, subject to appropriate confidentiality protections

We will not sell your personal data. We will not share your personal data with third parties for their own marketing purposes without your express prior consent.

INTERNATIONAL TRANSFERS

International transfers

Tungsten West is a UK-based company and stores personal data on servers located in the UK. If personal data is transferred outside the UK, we will ensure that appropriate safeguards are in place in accordance with UK GDPR — for example, by using contracts approved by the ICO or transferring only to countries that have been granted UK adequacy status.

COOKIES

Cookies

Our website uses cookies and similar tracking technologies to distinguish you from other users and to improve your experience. Cookies that are not strictly necessary for the operation of the website require your consent before being placed on your device.

A full description of the cookies we use, their purpose, and how to manage your preferences is set out in our separate Cookie Policy, available on our website. You can update your cookie preferences at any time via the cookie settings banner.

DATA SECURITY

Security

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, destruction, or damage. Where we have given you (or you have chosen) a password to access parts of our website or services, you are responsible for keeping that password confidential.

RETENTION

How long we keep your data

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for satisfying any legal, accounting, or regulatory requirements. The factors we consider include:

- The nature and sensitivity of the data
- The purposes for which it was collected and whether those purposes have been fulfilled
- Any legal obligation to retain the data for a minimum period
- The potential risk of harm from unauthorised use or disclosure

When your data is no longer required, we will securely delete or anonymise it.

AUTOMATED PROCESSING

Automated decision-making

We do not currently make decisions about you solely by automated means (without any human involvement) that produce legal or similarly significant effects. If this changes, we will update this notice and, where required by law, seek your consent or provide you with the opportunity to request a human review.

YOUR RIGHTS

Your rights

Under UK GDPR, you have the following rights in relation to your personal data:

Right of access	Request a copy of the personal data we hold about you
Right to rectification	Ask us to correct inaccurate or incomplete data
Right to erasure	Ask us to delete your personal data in certain circumstances
Right to restriction	Ask us to limit how we use your data in certain circumstances
Right to portability	Receive your data in a structured, machine-readable format and transfer it elsewhere, where technically feasible
Right to object	Object to processing based on legitimate interests or for direct marketing purposes

Right to withdraw consent	Withdraw consent at any time, where we rely on consent as the lawful basis
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To exercise any of these rights, please contact us via the contact form at tungstenwest.com or by writing to us at our registered office. We will respond within one month. We may need to verify your identity before processing your request. There is no charge for exercising your rights in most circumstances.

COMPLAINTS

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection:

Address	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Website	www.ico.org.uk
Helpline	0303 123 1113

We would appreciate the opportunity to address your concerns before you contact the ICO, so please get in touch with us in the first instance.

UPDATES

Changes to this notice

We may update this privacy notice from time to time to reflect changes in our practices or in applicable law. The date at the top of this page will always reflect when it was last revised. Where changes are material, we will take appropriate steps to bring them to your attention.

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