

Personal Data Protection and Privacy Policy

In compliance with the principles of legality, loyalty and transparency set out in the Ecuadorian Organic Law on the Protection of Personal Data (the "**LOPDP**"), this Personal Data Protection and Privacy Policy (the "**Policy**") outlines how data is collected, stored and processed by **Aurelian Ecuador S. A.** and/or **Aurelianmenor S.A.** (collectively, "**AURELIAN**" or the "**Data Controller**") as well as the rights of individuals whose data is being handled.

This Policy applies only when AURELIAN is collecting or otherwise processing personal information for AURELIAN's purposes (i.e., when AURELIAN (either alone or in common with other entities) is a controller and therefore determines the purposes for which and the manner in which any personal information is processed). In this Policy, the term "processing" means any activity performed on personal information, including, for example, collecting, storing, modifying, transferring or otherwise using it. Additionally, this Policy does not apply to other information (non-personal information) that AURELIAN may collect or otherwise process.

AURELIAN encourages the periodic review of this Policy to stay aware of any changes it.

1. WHO IS THE DATA CONTROLLER?

The applicable AURELIAN entity that is the "controller" of your data is the one with which you have a relationship, including for example: a supplier (e.g., the AURELIAN company that you are attempting to or have entered into a supplier relationship with), or as an applicant or employee (e.g., the AURELIAN company that you are attempting to or have entered into an employment relationship with).

- Data Controller: Aurelian Ecuador S. A. or Aurelianmenor S.A.
- Address: Primero de Mayo S/N and 12 de Febrero, Zamora Chinchipe, Yantzaza, Los Encuentros – Ecuador.
- Phone: 07 299-6400
- Email: DPD@lundingold.com

2. WHO IS THE DATA PROTECTION OFFICER?

- Data Protection Officer: Santiago Andrade Cadena
- Address: Prisma Norte, Edificio, Av. República de El Salvador 35-146 y, Quito 170505, Ecuador
- Telephone: +59322443866
- Email: DPD@lundingold.com

3. WHAT IS THE PURPOSE AND LEGAL BASIS OF PROCESSING PERSONAL INFORMATION?

In order to comply with AURELIAN's purposes as set out in the table below (the "**Purpose**"), AURELIAN may process personal data of the data subjects (the "**Data Subjects**"), whether automated or not, in accordance with what is permitted in the LOPDP. The types of data processed will vary depending on the nature of the processing activities carried out by AURELIAN and may include the categories of data outlined in the table below.

HEADLINE	PURPOSE	LEGAL BASIS	DATA CATEGORY
Suppliers and their business references	<ul style="list-style-type: none">• Manage any process related to contracting and payments.	<ul style="list-style-type: none">• Execution of pre-contractual measures	Identifying: <ul style="list-style-type: none">• Names and surnames• Contact data• Sex, nationality and age

HEADLINE	PURPOSE	LEGAL BASIS	DATA CATEGORY
	<ul style="list-style-type: none"> • Verify the supplier's commercial information 	<ul style="list-style-type: none"> and compliance with contractual obligations. (Art. 7.5. LOPDP). • Legitimate interest of the Data Controller (Art. 7.8. LOPDP). 	<ul style="list-style-type: none"> • Identity card or Passport • Health data • Signature • Criminal background checks • Marital status for embedded suppliers • Name and date of birth of immediate family members for embedded suppliers <p>Financial:</p> <ul style="list-style-type: none"> • Bank details
Employees of AURELIAN	<ul style="list-style-type: none"> • Manage the employers information in regards to the services they provide • Comply with the legal obligation that AURELIAN's has as the employer. 	<ul style="list-style-type: none"> • Consent of the Data Subject (Art. 7.1 LOPDP). • Execution of contractual measures at the request of the Data Subject (Art. 7.5 LOPDP). • Legitimate interest of the Data Controller (Art. 7.8. LOPDP). 	<p>Identifying:</p> <ul style="list-style-type: none"> • Names and surnames • Contact data • Sex, nationality, age, immigration status • Identity card or Passport • Academic, professional and employment data • Special categories, such as self-disclosure of gender, indigenous identification, disability • Health data • Signature • Criminal background check • Marital status • Name and date of birth of immediate family members <p>Financial:</p> <ul style="list-style-type: none"> • Bank details
Applicants for employment or professional services	<ul style="list-style-type: none"> • Manage personnel selection process submitted through any channel that AURELIAN determines for this purpose. • Verify the candidate's development environment and background. • Confirm the state of health of the person who is a candidate for employment or professional services. 	<ul style="list-style-type: none"> • Consent of the Data Subject (Art. 7.1 LOPDP). • Execution of pre-contractual measures at the request of the Data Subject 	<p>Identifying:</p> <ul style="list-style-type: none"> • Names and surnames • Contact data • Sex, nationality, age, immigration status • Academic, professional and employment data • Special categories, such as self-disclosure of gender, indigenous identification, disability • Health data • Criminal background check

HEADLINE	PURPOSE	LEGAL BASIS	DATA CATEGORY
		(Art. 7.5 LOPDP). • Legitimate interest of the Data Controller (Art. 7.8. LOPDP).	Financial: • Bank details
Access to AURELIAN's properties	<ul style="list-style-type: none"> • Direct and indirect capture of images of people by means of cameras that help with monitoring within AURELIAN's properties. • Verify access of people to AURELIAN's properties. • Publish images of events or projects within reports, on social networks and AURELIAN's website and those of its affiliates 	<ul style="list-style-type: none"> • Legitimate interest of the Data Controller (Art. 7.8. LOPDP). • Legitimate interest of the Data Controller (Art. 7.8. LOPDP). • Consent of the Data Subject (Art. 7.1. LOPDP). 	Identifying: <ul style="list-style-type: none"> • Image • Vehicle license plates • Names and surnames • Identity card or passport • Contact data • Signature • Image
Access to events hosted or sponsored by AURELIAN, or one of its affiliates, not held on AURELIAN's properties	<ul style="list-style-type: none"> • Comply with the legal obligation to respond to documents and verify AURELIAN's activities 	<ul style="list-style-type: none"> • Compliance with a legal obligation (Art. 7.2. LOPDP) 	Identifying: <ul style="list-style-type: none"> • Names and surnames • Identity card
	<ul style="list-style-type: none"> • Verify events hosted by or jointly with AURELIAN such as projects requested by the community and follow up on the reasons for them. 	<ul style="list-style-type: none"> • Legitimate interest of the Data Controller (Art. 7.8. LOPDP). 	Identifying: <ul style="list-style-type: none"> • Names and surnames • Identity card • Locality or institution to which you belong • Position held • Contact data • Signature
	<ul style="list-style-type: none"> • Verify visits and follow up on the reasons for them. 	<ul style="list-style-type: none"> • Legitimate interest of the Data Controller (Art. 7.8. LOPDP). 	Identifying: <ul style="list-style-type: none"> • Names and surnames • Identity card • Locality or institution to which you belong • Position held • Contact data • Signature
	<ul style="list-style-type: none"> • Evidence of AURELIAN's compliance with the social development plan through 	<ul style="list-style-type: none"> • Compliance with a legal obligation 	Identifying: <ul style="list-style-type: none"> • Names and surnames • Identity card

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	a PMA (Plan de Manejo Ambiental/ Environmental Management Plan) report.	<ul style="list-style-type: none"> (Art. 7.2. LOPDP). Legitimate interest of the Data Controller. (Art. 7.8. LOPDP). 	<ul style="list-style-type: none"> Community to which you belong Special categories, such as self disclosure of gender, indigenous identification, disability Signature
	<ul style="list-style-type: none"> Follow up on programs carried out together with the communities 	<ul style="list-style-type: none"> Legitimate interest of the Data Controller. (Art. 7.8. LOPDP). Execution of pre-contractual and contractual measures at the request of the Data Subject (Art. 7.5 LOPDP). 	Identifying: <ul style="list-style-type: none"> Names and surnames Identity card Community to which you belong Signature
	<ul style="list-style-type: none"> Monitor the social development of the community. 	<ul style="list-style-type: none"> Legitimate interest of the Data Controller. (Art. 7.8. LOPDP). 	Identifying: <ul style="list-style-type: none"> Names and surnames Identity card Community to which you belong Signature.
	<ul style="list-style-type: none"> Publish images of events or projects within reports, on social networks and AURELIAN's website and those of its affiliates 	<ul style="list-style-type: none"> Consent of the Data Subject (Art. 7.1. LOPDP). 	Identifying: <ul style="list-style-type: none"> Image
Social actors	<ul style="list-style-type: none"> Evaluate the profile of the actors and the social behavior of the members of the community in the face of a position. 	<ul style="list-style-type: none"> Legitimate interest of the Data Controller (Art. 7.8. LOPDP). 	Identifying: <ul style="list-style-type: none"> Names and surnames Personal preferences: <ul style="list-style-type: none"> Profile, interest and influence in favor, neutral or against a position.

4. WHAT IS THE STORAGE PERIOD OF THE DATA TO BE PROCESSED?

In the event that the contractual relationship with the Data Subjects is terminated, AURELIAN will store personal information in accordance with applicable data protection laws or internal data retention policies. To the fullest extent permitted by law, AURELIAN will store Data Subjects' personal data for a reasonable period of time to allow the Data Controller to defend itself in the

event of any administrative or judicial claim filed by it or against it in relation to such contractual relationship.

In the event that the authority establishes specific retention period deadlines, AURELIAN undertakes to maintain the personal data for a period not longer than the maximum period established by the authority.

5. DOES AURELIAN HAVE A DATABASE?

AURELIAN only has databases that are formed by the systems that are used within the company. These data bases are fed by the execution of pre-contractual measures or the signing of contracts, or by the direct communication of personal data by the Data Subjects to AURELIAN, among others.

6. WHAT IS THE ORIGIN OF THE PERSONAL DATA?

AURELIAN collects and processes the personal information of its employees, applicants, customers, potential customers, suppliers and strategic partners, potential suppliers and strategic partners, obtained through any means, in its different interactions, including: requests for product quotes, linking forms, contact forms, forms for receiving applications for work in AURELIAN, on our internet portal, claims made through the channels established by AURELIAN, phone calls, email messages and other communication sources, public sources, etc.

7. ARE THERE OTHER PURPOSES OR FURTHER PROCESSING?

AURELIAN does not carry out further processing of the data it processes or use it for purposes other than those reported within this Policy. In the event that AURELIAN needs to process personal data for other purposes, the Data Controller undertakes to adequately inform the Data Subjects, and if necessary, collect the appropriate consents.

8. IS THE DATA COMMUNICATED OR TRANSFERRED NATIONALLY OR INTERNATIONALLY?

AURELIAN only transfers limited personal data of specific Data Subjects internationally to its parent company, LUNDIN GOLD INC.

9. WHAT HAPPENS IF PERSONAL DATA IS NOT DELIVERED, OR IS DELIVERED WITH ERRORS OR INACCURACIES?

In order to fulfill any of the purposes established by AURELIAN, the Data Subjects must provide accurate and complete information, otherwise the services or requests may not be provided or processed in an adequate manner.

Likewise, AURELIAN reserves the right not to provide or process the service or requests to the Data Subjects, if their data are not delivered, or are delivered with errors, inaccuracies or incorrectness.

10. WHAT ARE MY RIGHTS REGARDING THE PROCESSING OF MY PERSONAL DATA AND HOW CAN I EXERCISE THEM?

10.1. The Data SUBJECTS may exercise the following rights against the processing of their personal data by the Data Controller:

- **Right to information:** Data Subjects have the right to be informed about the processing of their data, in accordance with the principles of loyalty and transparency as set out by LOPDP, by any means.
- **Right of access:** Data Subjects have the right to know and obtain free access to all their personal data that AURELIAN processes, without the need to present any justification.
- **Right to rectification and updating:** Data Subjects have the right to have their personal data that is inaccurate or incomplete rectified or updated by the Data Controller. To exercise this right, the Data Subject must present the justifications of the case, when relevant.
- **Right to restriction of processing:** Data Subjects have the right to have the Data Controller process only the data that is necessary for the Purpose specific to such data collection.
- **Right of deletion:** The Data Subjects have the right to have their personal data deleted by AURELIAN, when:
 - i. The processing of your data does not comply with the principles established in the LOPDP;
 - ii. The processing of your data is not necessary or relevant for the fulfilment of the Purpose;
 - iii. The personal data of the Data Subjects have fulfilled the purpose for which they were collected or processed;
 - iv. The retention period for your personal data has expired;
 - v. The processing affects your fundamental rights or individual freedoms;
 - vi. The Data Subjects revoke the consent given or it is indicated that they have not granted it for one or more specific purposes, without the need for any justification; or
 - vii. There is a legal obligation.

We undertake, in the event that the Data Subjects exercise this right, AURELIAN will do the best efforts to implement methods and techniques aimed at eliminating, making illegible, or leaving unrecognizable in a definitive and secure manner their personal data. Permanent deletion of data may not be feasible due to the impact on applications and systems. Where legally permissible, we may restrict further access or usage of data instead of deleting it.

In compliance with the LOPDP, AURELIAN ratifies that the Data Subjects may revoke their consent for the processing of personal data by the Data Controller at any time, unless any limitation to the exercise of this right established in section 10.3 of this Policy is met.

- **Right to object:** Data Subjects have the right to object or refuse the processing of their personal data.

The Data Controller will stop processing your personal data, unless we demonstrate legitimate and compelling reasons for the processing to prevail over the interests, rights and freedoms of the Data Subjects, or for the formulation, exercise or defense of claims.

- **Right to portability:** Data Subjects have the right to receive their personal data from the Data Controller in a compatible, updated, structured, common, interoperable and machine-readable format, preserving their characteristics; or to transmit them to other data controllers.

The Data Subjects may request AURELIAN to transfer or communicate personal data to another data controller as soon as technically possible and without the Data Controller being able to claim impediment of any order in order to slow down the access, transmission or reuse of data by the Data Controller or another data controller. After completing the transfer of data, the Data Controller will proceed to delete the personal data of the Data Subjects, unless the Data Subjects order their conservation.

In order for the right to data portability to apply, at least one of the following conditions must be met:

- i. That the Data Subjects have given their consent for the processing of their personal data for one or more specific purposes. The transfer or communication will be made between data controllers when the operation is technically possible, otherwise the data must be transmitted directly to the Data Subjects.
- ii. That the processing is carried out by automated means; or
- iii. That it is a relevant volume of personal data;

This right will not apply when it comes to information inferred, derived, created, generated or obtained from the analysis or processing carried out by AURELIAN based on the personal data provided by the Data Subjects, as is the case of personal data that have been subjected to a process of personalization, recommendation, categorization or creation of profiles. Notwithstanding the foregoing, the Data Controller reserves the right to continue processing the Data Subject's personal data in accordance with section 10.3 of this Policy.

- **Right to suspension of processing:** Data Subjects have the right to obtain from the Data Controller the suspension of data processing when any of the following conditions are met:
 - i. When the Data Subjects contest the accuracy of the personal data, while the Data Controller verifies the accuracy of the same;
 - ii. The processing is unlawful and the Data Subjects object to the deletion of the personal data and request, instead, the limitation of their use; and
 - iii. The Data Controller no longer needs your personal data for the purposes of the processing, but the Data Subjects need it for the formulation, exercise or defense of claims.
- **Right not to be subject to a decision based solely or partially on automated valuations:** Data Subjects have the right not to be subjected to a decision based

solely or partially on valuations that are the product of automated processes, including profiling, that produce legal effects on them, or that infringe their fundamental rights and freedoms, for which the Data Subjects may:

- i. Request from the Data Controller a reasoned explanation of the decision taken by AURELIAN or the person in charge of the processing of personal data;
- ii. Submit observations;
- iii. Request from the Data Controller the evaluation criteria for the automated program;
- iv. Request from the Data Controller about the types of data used and the source from which they have been obtained; and
- v. Challenge the decision made by AURELIAN or the Data Controller.

This right shall not apply where:

- i. The decision is necessary for the conclusion or execution of a contract between the Data Subjects and AURELIAN or between the person in charge of the processing of personal data;
- ii. It is authorized by the applicable regulations, court order, resolution or reasoned mandate of the competent technical authority, for which we will establish appropriate measures to safeguard the fundamental rights and freedoms of the Data Subjects;
- iii. The explicit consent of the Data Subjects is obtained; or
- iv. The decision does not entail serious impacts or verifiable risks for the Data Subjects.

10.2. Once a request for any right established in this Policy has been received from the Data Subjects, AURELIAN undertakes to process it within thirty business days.

10.3. The Data Controller reserves the right to continue processing the personal data of the Data Subjects, so you will not be able to exercise your rights of rectification, updating, deletion, opposition, cancellation and portability, in the following cases:

- i. If you are not the owners of the personal data or your legal representative is not duly accredited;
- ii. When the personal data is necessary for compliance with a legal or contractual obligation;
- iii. When the personal data are necessary for compliance with a court order, resolution or reasoned mandate of a competent authority;
- iv. When the personal data are necessary for the formulation, exercise or defense of claims or appeals;
- v. When damage may be caused to the rights or affectation of the legitimate interests of third parties, and this is accredited by the Data Controller at the time of responding to the request to exercise the respective right;

- vi. When it is possible that compliance with the request may obstruct judicial or administrative proceedings in progress, and you are duly notified of such obstruction by the Data Controller;
- vii. When the personal data is necessary to exercise the right to freedom of expression and opinion; and
- viii. In cases where the public interest is involved, subject to compliance with the international human rights standards applicable to the matter, compliance with the principles of the LOPDP and the criteria of legality, proportionality and necessity.

11. WHERE AND HOW TO EXERCISE MY RIGHTS OR COMPLAINTS?

To exercise any of the rights set forth herein or to commence a claim regarding the processing of personal data, the Data Subject must send a written request to the address or email of the Data Protection Officer established in section 1 of this Policy.

The application must contain at least the following:

Full names and surnames of the Data Subject, identity card or passport number and home or email address for notifications. When acting as a legal representative, the data of the legal representative shall also be recorded;

- i. If possible, a clear and precise description of the personal data with respect to which you seek to exercise any of the rights mentioned in section 10 of this Policy, and any other element or document that facilitates the location of the personal data;
- ii. A list of what is requested set out in a clear and precise manner;
- iii. Right or rights that you wish to exercise; and
- iv. The application must be accompanied by documents proving the identity or, where appropriate, the legal or conventional representation of the Data Subject.

In the event that the information contained in the application requires clarification or expansion, AURELIAN will require the Data Subject, only once and within five days of receipt of the application, to clarify or complete it.

The Data Subjects will have a period of ten days from the day following the day on which they have been notified with the request for clarification or extension to clarify or complete the request and return it to the Data Controller.

If the Data Subjects clarify or complete the request within the aforementioned period, the Data Controller will give due attention to the request, otherwise AURELIAN reserves the right to archive the request, for which the Data Subjects will be notified of this fact with the reasons for the decision.

They may also contact the Data Protection Officer, whose contact can be found in the corresponding section of this Policy.

12. ARE THERE AUTOMATED ASSESSMENTS AND DECISIONS, INCLUDING PROFILING, THAT ARE MADE WITH MY DATA?

AURELIAN does not assess and makes purely automated decisions that produce legal effects on the Data Subjects or infringe on their fundamental rights and freedoms.

13. CHANGES TO TERMS AND CONDITIONS

AURELIAN may change this Policy at any time by posting the revised Policy on this website and indicating the effective date of the revised Policy. The revised Policy will be effective once posted unless we state otherwise.

AURELIAN may also supplement or modify our privacy commitments in this Policy through other notices we make available to Data Subjects or through contractual commitments we enter into in writing.

Last modified: 18 of June of 2025.