



External Privacy Notice – China 淡水河谷隐私声明

This privacy notice ("Notice") is intended to demonstrate the commitment of Vale Minerals China Co., Ltd., Vale Metals (Shanghai) Co., Ltd. and its affiliate companies (collectively "Vale" or "We"), to your privacy and the protection of your data in a transparent manner and in accordance with the applicable law.

本隐私声明（以下简称“声明”）旨在展示淡水河谷矿产品（中国）有限公司、淡水河谷金属（上海）有限公司及其关联方（以下合称“淡水河谷”或“我们”）根据适用法律以公开透明的方式保护您的隐私和数据安全的承诺。

The protection of privacy and personal data reflects Vale's values, and this notice aims to reaffirm our commitment to security and transparency in handling data.

保护隐私和个人数据的行为彰显了淡水河谷的价值观，本声明重申了我们秉持安全、透明原则处理数据的承诺。

The goal of this notice is to clarify how Vale processes third-party personal data when providing services for you or granting you access to our physical and digital environments (collectively referred to as "Our Environments").

本声明旨在阐明淡水河谷在为您提供服务或授权您访问我们的物理和数字环境（统称为“我们的环境”）时如何处理第三方个人数据。

We are constantly updating ourselves to provide you with the most efficient services and features possible. As a result, this Notice may be changed at any time, and you are responsible to review it whenever feasible.

我们一直在不断完善和提升自我，以期为您提供最高效的服务和最完善的功能。因此，本声明可能随时更改，您有责任在可行情况下对本声明进行审阅。

What data is collected?

收集哪些数据？

Vale collects personal data when you submit or provide it to Vale through Our Environments, and we handle all personal data collected in compliance with the



applicable regulations. We may also collect your personal data from third-party sources.

当您通过我们的环境向淡水河谷提交或提供个人数据时，淡水河谷将收集这些个人数据，我们将按照适用法规处理所有收集到的个人数据。我们还可能从第三方来源收集您的个人数据。

The data collected may include: (i) identifying information such as name, ID card number, Social Security Number, WeChat ID number, passport information; (ii) contact information such as email and phone number; and (iii) demographic information such as age/date of birth and gender (iii) financial data; (iv) navigation data, such as cookies and IP address; (v) health data; (vi) biometric data and other data that may be required for the execution of our business activity; (vii) employment data such as company which you work at and your position; (viii) event & conference data such as dress size and travel information, depending on the relationship between Vale and you.

我们收集的数据可能包括：（i）姓名、身份证号、社会保障号、微信号、护照信息等身份识别信息；（ii）电子邮件和电话号码等联系信息；（iii）年龄/出生日期和性别等人口统计信息；（iv）财务数据；（v）Cookies 和 IP 地址等导航数据；（vi）健康数据；（vii）生物特征数据和我们执行业务活动可能需要的其他数据；（viii）您所在公司的名称和职位等就业数据；（viii）服装尺寸和差旅信息等活动和会议数据，具体取决于淡水河谷与您之间的关系。

Personal data can be collected to:

个人数据的收集旨在：

- Identify and authenticate you in Our Environments, such as access to certain portions of our website, visiting our units, or using our services.
- 在我们的环境中对您的身份进行识别和验证，例如当您访问我们网站的特定板块、访问我们业务部门或使用我们的服务时。
- Comply with contractually imposed obligations arising from the usage of our services.
- 遵守因使用我们的服务而产生的合同义务。
- Deepen our relationship by keeping you informed about news, features, content, market communications and other events that we believe are important to you.
- 向您推送我们认为对您而言有着重要意义的新闻、功能、内容、市场传播信息和其他事件，以便增进彼此之间的关系。
- Allow contact through the Contact Us channel.
- 便于您通过“联系我们（Contact Us）”渠道与我们取得联系。
- Enable reporting in our Whistleblower Channel.
- 使用我们的“报告和举报（Whistleblower）”渠道的报告功能。
- Allow access to our Ombudsman.
- 便于您访问我们的“申诉（Ombudsman）”渠道。
- Enable you to register for open positions through Work With Us, or other applicable tools.

- 便于您通过“加入我们（Work With Us）”渠道或其他适用工具注册申请空缺职位。
- **Protect you by preventing fraud in the access and the risks associated with it, as well as complying with legal and regulatory requirements.**
- 帮助您预防访问过程中的欺诈行为和与之相关的风险，确保遵守法律和监管要求，为您提供保护。
- **Enable humanitarian and other interactions with the community by Vale.**
- 便于淡水河谷开展人道主义行动并与社区进行其他互动。
- **Enable assistance to communities as applicable.**
- 在适用情况下为社区提供援助。
- **Comply with legal obligations under applicable laws.**
- 遵守适用法律规定的法律义务。
- **Maintain security in access to Our Face-to-Face Environments, as well as monitoring the security of Our Environments.**
- 确保面对面环境访问的安全性，并监控我们的环境安全。
- **Allow Vale's business activities to continue through the management of former employees and outsourced service providers.**
- 管理前雇员和外包服务提供商，以便淡水河谷能够持续开展业务活动。
- **Conduct conflict of interest analysis and other controls.**
- 开展利益冲突分析和其他控制活动。
- **Conduct customer satisfaction survey.**
- 开展客户满意度调查。

Some of our services rely on the data provided above, you are solely responsible for the accuracy, truthfulness, and lack of the data you provide. We might be unable to deliver all or part of our services to you if you are unable to provide all or part of the data as required.

我们的部分服务依赖于上述提供的数据，您对自己提供的数据的准确性、真实性和缺失承担全部责任。如果您无法按照要求提供全部或部分数据，我们可能无法向您提供全部或部分服务。

Likewise, Vale is also not obligated to process any of your data if there are reasonable grounds to suspect that doing so would subject us to a violation of any relevant law, or if you are using Our Environments for any illegal, illegal, or immoral purposes.

同样，如果有合理理由怀疑处理您提供的数据会导致我们违反任何相关法律，或者如果您出于任何非法、违法或不道德的目的使用我们的环境，淡水河谷亦无义务处理您提供的任何数据。

More information about the use of personal data can be found in the terms of each Vale service, which can be accessed in their respective environment.

有关个人数据使用的更多信息，参见淡水河谷各项服务的具体条款，您可以在相应的环境中访问这些服务。

How is personal data shared?



如何共享个人数据？

Vale may, observing the applicable legal bases, share the personal data with third parties, as exemplified below:

在遵守适用法律依据的情况下，淡水河谷可能会与如下所示的第三方共享个人数据：

- **Suppliers, if necessary for the provision of services. In such case, in order to ensure compliance with applicable legislation, the parties establish rights and responsibilities for the sharing.**
- 供应商。如果供应商需要我们提供个人数据才能提供服务，则为了确保遵守适用法律，双方应明确数据共享的权利和责任。
- **IT service providers. Vale may engage these service providers for their clouding services or SaaS services, during which the IT service provider will process your personal data on behalf of Vale.**
- IT 服务提供商。淡水河谷可能会使用这些服务提供商提供的云服务或 SaaS 服务，在此期间，IT 服务提供商将代表淡水河谷处理您的个人数据。
- **Its controlled companies and other group companies, whenever necessary. These companies are both inside and outside the national territory, and the purpose of such sharing is to accomplish the purposes outlined in this Notice.**
- 淡水河谷控股公司和其他集团公司（在必要时与其共享个人数据）。这些公司可能位于境内或境外，仅可出于本声明中所述之目的与这些公司共享个人数据。
- **Related authorities, whenever facing a legal determination, request, requisition, or court order or whenever necessary to respond to inquiries or investigations, or defense interests.**
- 相关机构。当面临相关机构的司法裁定、请求、征用或法院命令时，或在回应司法问询或调查，或进行利益抗辩时，可能会与相关机构共享个人数据。
- **Companies headquartered and located outside of the national territory, whenever necessary to meeting the purposes set out in this Notice. Whenever personal data is transferred internationally, Vale will make all reasonable efforts to ensure proper security and protection, in compliance with the applicable data protection laws.**
- 总部或地址位于本国领土以外的公司。当满足本声明中所述之目的有需要时，可以与这些公司共享个人数据。无论何时在国际间传输个人数据，淡水河谷均应根据适用的数据保护法律，尽一切合理努力保障个人数据的安全。
- **Interested parties, in the case of corporate changes such as mergers, acquisitions, incorporations and sales, as well as *due diligence* procedures and legal audits within the scope of these changes.**
- 相关方。在公司发生变更的情况下，例如合并、收购、注册成立和销售，以及在公司变更范围内开展尽职调查程序和法律审计的情况下，可能会与相关方共享个人数据。

What are your rights in relation to your personal data?

您享有哪些与个人数据相关的权利？

You may, for example, within the rights provided in the applicable law, request confirmation of the processing of your personal data, as well as the access to or request a copy of your personal data, its rectification, supplement and portability to another controller designated by you, when applicable.

例如，在适用法律规定的权利范围内，您可以要求对您个人数据的处理信息进行确认，要求访问您的个人数据、更正信息和补充信息或获取相关信息的副本，或将您的个人数据移植到您指定的另一台控制器（如适用）。

You can also:

您还可以：

(i) Request the restriction of the processing of your personal data;

(i) 要求限制处理您的个人数据；

(ii) Object to the processing and/or revoke consent to the use of your personal data;

(ii) 反对处理您的个人数据和/或撤销对您个人数据的同意书；

(iii) Request your personal data gathered in connection with the use of Our Environments to be erased or deleted.

(iii) 要求擦除或删除因使用我们的环境而收集的您的个人数据。

These rights can be exercised by contacting us via the form at the bottom of this page.

您可以通过本页底部表格与我们取得联系，进而行使这些权利。

If you request us to delete your personal data, the data may still need to be kept to comply with legal or regulatory requirements, depending on the requirements of the applicable legislation.

如果您要求我们删除您的个人数据，出于遵守法律或监管要求的原因，这些数据可能仍需予以保留，具体取决于适用立法的要求。

How is the protection of personal data guaranteed and how can you help protect it?

如何确保个人数据得到保护，以及您如何帮助保护个人数据？

As Vale operates its business globally, your personal data may be stored and processed outside the jurisdiction where you are located.



淡水河谷在全球范围内运营，因此可能在您所在司法管辖区以外的国家/地区存储和处理您的个人数据。

Personal data is protected against unauthorized access, unlawful processing, or disclosure, as well as accidental loss, alteration, or destruction. This is applicable regardless of whether the data is handled in an electronic or physical environment.

我们将保护个人数据免遭未经授权的访问、非法处理或披露，以及意外丢失、更改或破坏。无论是在电子环境还是物理环境中处理个人数据，这条规定都适用。

Vale has implemented all necessary technical and organizational measures to protect personal data, including data classification, backup and restoration, and identity and access control. These measures are based on a risk assessment of data protection and security.

淡水河谷已在技术和组织层面执行所有必要的措施，以保护个人数据，包括数据分类、备份和恢复以及身份和访问控制等。这些措施均基于对数据保护和安全的风险评估。

When personal data is deleted, the process is carried out securely in accordance with the required technical measures, to ensure that the deleted personal data cannot be recovered.

如需删除个人数据，我们会按照所需技术措施的要求，以安全的方式执行操作，以确保删除的个人数据无法恢复。

Internally, the access and processing of personal data are guided by the principles of minimizations, necessity, and relevance to our business goals, in addition to our commitment to maintaining the confidentiality of information in our structure and protecting your privacy under the terms of this Notice. When using Our Environments, You may be directed to other portals or platforms, via a link, which may collect your information and have their own Privacy Policy. It is your responsibility to read the Privacy Policies of such portals or platforms outside of Our Environments and to accept or reject them. Vale is not responsible for the content of any external websites or services, nor for the privacy and data processing policies of third parties.

除承诺在组织结构层面维持信息的机密性并根据本声明所述之条款保护您的隐私外，在内部，个人数据的访问和处理遵循最小化、必要性以及与我们业务目标相关的原则。在使用我们的环境时，您可能会通过一个链接被定向至其他门户或平台，这些门户或平台可能会收集您的信息并且拥有各自的隐私政策。您有责任阅读我们的环境之外的此类门户或平台的隐私政策，并接受或拒绝这些政策。淡水河谷不对任何外部网站或服务的内容负责，亦不对第三方的隐私和数据处理政策负责。

To optimize and improve our communication, when we send you an email, we may receive notifications when it is opened if such option is available. It is



important that you pay attention to the sender, as emails are only sent by domains belonging to Vale.

为了优化和改进沟通效果，当我们向您发送电子邮件时，如果有“阅读收条”选项，我们可能会在您打开电子邮件时收到通知。请您务必留意发件人，因为我们仅使用属于淡水河谷的域名发送电子邮件。

How long is data retained?

数据保留多长时间？

All personal data collected will be processed and stored while needed to accomplish the purposes for which such personal data is collected, or until the right of opposition or revocation of permission is exercised, whichever is applicable.

我们收集的所有个人数据将在需要时进行处理和存储，以实现收集此类个人数据的目的，或直到您行使反对权或撤销许可（视情况而定）。

The data may also be stored in our files in accordance with the legal system's deadlines, whether to comply with a legal or regulatory requirement or regular exercise of rights. Therefore, this justifies the maintenance of personal data in our databases, subject to the same security and protection measures as those indicated above.

无论是出于遵守法律或监管要求的目的，还是出于定期行使权利的目的，我们可能会根据法律体系的期限要求将数据存储在我们的文件中。由此可见，我们对存储在我们数据库中的个人数据也给予了合理的维护，并遵循与上文所述相同的安全和保护措施。

The data collected will be stored on our servers, which may be located inside or outside the place where you are located, as well as in a cloud computing environment, which may require the transfer and/or processing of such information abroad.

我们将收集到的数据存储在我们的服务器上，这些服务器可能位于您所在国家/地区，可能位于其他国家/地区，也可能位于云计算环境中，因此可能需要在国外传输和/或处理此类信息。

Other Provisions

其他规定

If any aspect of this Notice is considered invalid by any competent Data Protection Authority or by the competent administrative or judicial authority, the other conditions will remain in effect and in full force.

如果本声明的任何部分被任何数据保护主管机构或行政或司法主管机构视为无效，本声明的其他条款将继续有效。



All Vale's communication sent to you via its channels are valid, effective, and sufficient to disclose any issue relating to the services we provide, your personal data, and any other matter we deem relevant to the provision of our services and features.

淡水河谷通过自有渠道向您发送的所有沟通内容均合理、有效，且足以披露与我们提供的服务和您的个人数据相关的事项以及我们认为与提供我们的服务和功能相关的任何其他事项。

If you have any questions or any doubts regarding the provisions of this Notice, please contact us by using the contact form at the bottom of this page.

如果您对本声明所述之规定有任何疑问，请通过本页底部的联系表格与我们联系。

For the purposes of this Notice, the following definitions and descriptions shall apply for your better understanding:

本声明包含以下定义和说明，以便您更好地理解本声明：

(i) **Anonymization:** Applying reasonable technical measures available at the time of treatment, whereby data loses the ability to be linked to an identifiable individual, either directly or indirectly.

匿名化：采用处理时可用的合理技术措施，移除数据中可直接或间接识别个人信息的能力。

(ii) **Cookies:** Small files sent by Our Environments and saved on your devices, that store preferences and little other information to customize your browsing according to your profile.

Cookies：由我们的环境发送并保存在您的设备上的小文件，可存储首选项和少量其他信息，以便我们根据您的资料为您定制浏览信息。

(iii) **Cloud Computing:** A service virtualization technology that is based on the connectivity of multiple servers across a shared data network (e.g. the Internet).

云计算：基于通过共享数据网络（如互联网）中多个服务器连接在一起的服务虚拟化技术。

(iv) **Data:** Any information entered, processed, or transmitted through Our Environments.

数据：通过我们的环境输入、处理或传输的任何信息。

(v) **Personal Data:** Data relating to an identified or identifiable natural person.

个人数据：与已识别或可识别自然人相关的数据。

(vi) **IP:** Short for Internet Protocol. It is an alphanumeric set that identifies users' devices on the Internet;

IP：互联网协议的简称。其为字母数字集，用于识别互联网上的用户设备；

(vii) **Processing:** All operations carried out with personal data, such as those related to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage,



deletion, evaluation or control of information, modification, communication, transfer, dissemination or extraction.

处理：对个人数据执行的所有操作，如与收集、制作、接收、分类、使用、访问、复制、传输、分发、处理、存档、存储、删除、评估或控制信息、修改、沟通、传输、传播或提取相关的操作。