

NMG (as defined below) considers privacy to be fundamental to our relationship with investors. We are committed to maintaining the confidentiality, integrity and security of investors' personal data. We appreciate that we have access to information about our investors that is not generally available to the public and understand NMG's obligation to protect the privacy of that information.

As used in this Notice, "NMG" means: (a) Northwest Metals Group Limited, a Barbados company; (b) Northwest Metals Group LLC, a Delaware limited liability company; and (c) any other entity controlled by NMG.

This Privacy Notice (the "Notice") details how the relevant shareholders, members or affiliates of NMG ("we" or "us") (including the managing members of limited liability companies and the directors of corporations, in each case controlled by NMG, in which existing, former and prospective investors ("Investors") invest) process personal data received about Investors (the Investor referred to herein as "you") in relation to the investment or potential investment in NMG, how we collect, share, and process such personal data and your rights and obligations in relation to your personal data during the course of your investment. For information about personal data collected about individuals outside this context, please see our website terms of use.

This Notice also describes the measures we have taken in order to protect the confidentiality, integrity and security of personal data regarding Investors, our purposes for collecting such information, Investors' rights regarding their personal data and the way to contact NMG to exercise those rights. It also describes the limited extent to which we may share that information with affiliates and non-affiliated third parties of NMG.

This Notice and the policies described herein are subject to change at any time.

Data Controller

NMG is the data controller in relation to personal data relating to Investors. Relevant information on NMG and applicable affiliates is available in NMG's legal documents and subscription agreements. These documents are accessible to existing Investors at or can be made available by emailing [__]. These documents are available to new Investors via a secure data room available by emailing [__].

Our contact details for all data privacy inquiries and questions are provided at the end of this Notice.

Collection of Information

As an Investor, you will provide your personal data to us by completing subscription forms and associated documentation and by communicating with us by phone, e-mail or otherwise. In all cases, we may collect and process the following personal data about you:

(a) Contact and/or personal data such as first name, last name, telephone number, email address, residential address, business address;

(b) Government-issued identifiers such as Passport number, driver's license number, tax ID numbers;

(c) Other information we collect from subscription agreements and/or other forms of communications with you, such as social security numbers, net worth and sources of income;

(d) Bank details and wire instructions;

(e) Screening against various lists, criminal searches and newspaper coverage;

(f) KYC and/or AML documentation including proof of identity and proof of address (for example, utility bills, bank statements, driver's license, passport or other photo ID);

(g) With regard to each of your visits to the [data room] we automatically collect technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

(h) Information in relation to your net worth, history of investments, investment preferences and/or tax position.

Use of Information

1. We use your personal data such as (a) first name, last name, telephone number, email address, residential address, business address, (b) government-issued identifiers such as passport number, driver's license number, and tax ID number, (c) information in relation to your net worth, history of investments, and/or tax position for purposes of account administration, management of your subscription, maintaining the register of shareholders and distributions, wire instructions, internal audit validations, communications, events, investor relations and more generally performance of services requested by and operations in accordance with the instructions of the Investor. The use of such data is necessary for our legitimate interests to ensure effective administration of your investment and for the entry into and performance of a contract.

2. We use your contact information such as (a) first name, last name, telephone number, email address, residential address, business address, (b) date of birth, place of birth, citizenship, tax residency, utility bills or other identification records, (c) government-issued identifiers such as passport number, driver's license number, tax ID number or other identifiers, (d) criminal searches, legal searches, news coverage, social media searches, and (e) KYC and/or AML documentation including proof of identity and proof of address in order to perform AML/KYC checks, screening against sanctions lists, background checks and compliance with all relevant legal, regulatory and administrative obligations and responsibilities of NMG and/or any shareholder of NMG and/or any counterparty of NMG (including providers of debt or equity finance and vendors) including pursuant to any applicable law, FATCA or similar regimes, transactions reporting, complying with requests from, and requirements of, local or foreign regulatory or law enforcement authorities, tax identification and reporting, any other automatic exchange of information regimes. The use of such information is necessary for compliance with legal and regulatory obligations including sanctions laws/AML and KYC laws and or any other laws applicable to the data controller.

3. We use contact information such as (a) first name, last name, telephone number, email address, residential address, business address, (b) government-issued identifiers such as passport number, driver's license number, tax ID number, and (c) KYC and/or AML documentation including proof of identity and proof of address for risk management and fraud prevention purposes including for the evaluation of the Investor's financial needs, monitoring the Investor's financial situation including for assessing its creditworthiness and solvency, to manage litigation and for our accounting purposes. The use of such information is necessary for our legitimate interests to run an efficient and successful business.

4. We use your contact information such as first name, last name, username, telephone number, email address, date/time and content of the call to monitor electronic communications for quality and business analysis. The use of such information is necessary for our legitimate interests to run an efficient and successful business.

5. We use your contact information such as first name, last name, telephone number and email address for the purpose of receiving materials and information about the business and fundraising activities of NMG. You can opt out of receiving such communications at any time by contacting us at info@nwmetagroup.com. The use of such information is necessary for our legitimate interests to run an efficient and successful business and involves consent where required.

6. We use your contact information such as first name, last name, telephone number, email address and wire instructions or other bank details, payment amounts and percentage share ownership for the purpose of processing payments. This use is necessary for entry into and performance of a contract for our legitimate interests to ensure effective administration of our business.

Retention of Information

Investors' personal data will be retained only for as long as the information is needed to fulfill the purposes for which it is collected and processed. NMG reserves the right to retain and use Investors' personal data for as long as necessary to comply with our legal and regulatory obligations and business requirements and/or to resolve any ongoing disputes and enforce our agreements. For the avoidance of doubt, data will not be destroyed before any regulatory retention period expires, or during a pending investigation, whether legal or regulatory.

Disclosure of Information

We do not disclose personal data regarding Investors except in accordance with our Notice described herein and as permitted or required by applicable law. We may disclose personal data regarding an Investor to non-affiliated third parties under one or more of the following circumstances: (a) as authorized by subscription agreements or organizational documents for NMG or as otherwise authorized by the Investor; (b) to the following service providers: as NMG's corporate secretary; as NMG's Barbados counsel; as NMG's statutory auditor; (c) in connection with: (i) the administration, processing and servicing of an Investor's investment in NMG and with NMG's general business operations; and (ii) to satisfy any anti-money laundering related customer identification procedures required by any laws or regulations applicable to such entities; (d) in connection with the making, management or disposition of any NMG investment; (e) as otherwise necessary to effect, administer or enforce Investor or NMG transactions; or (f) as required or permitted by applicable law (for example, in connection with regulatory or law enforcement inquiries).

All of your personal data will be accessible within NMG for the purpose of reviewing new Investors including conducting KYC and AML checks, screening against sanctions lists, fund administration, investor relations, compliance and legal functions and facilitating fundraising activities for new investments. We may share personal data regarding an Investor with our affiliates, consultants and employees for legitimate business purposes, for example, in order to service Investor accounts.

Protection of Information

We maintain physical, electronic and procedural safeguards that comply with applicable standards to protect personal data regarding Investors. We use reasonable best efforts to require that any person or institution to which we disclose personal data regarding an Investor will protect the confidentiality of that Investor's information and use the information only for the purposes for which we disclose the information to them. In addition, we restrict access to nonpublic personal data regarding Investors to those consultants and employees who need to know that information in the course of their job responsibilities.

Data Subject Rights

The General Data Protection Regulation (the "GDPR") and other national privacy laws provide data subjects with certain rights regarding their personal data. To the extent that the GDPR applies to Investors whose personal data is collected and processed by NMG, these Investors have certain rights as detailed below. Please note that we will require you to verify your identity before responding to any requests to exercise such rights by providing proof of identity and address in a form satisfactory to us. We must respond to a request by you to exercise those rights without undue delay and at least within one (1) month (although this may be extended by a further two (2) months in certain circumstances). To exercise any of your rights, please contact [].

(a) Data Rights. In certain circumstances, you have the right to access and receive a copy of the information we hold about you, to rectify any personal data held about you that is inaccurate and to request the deletion, portability, or suspension of or access to personal data held about you. Any access request after the first such request by you may be subject to a reasonable fee to meet our costs in providing you with details of the information we hold about you. You can exercise your rights by contacting us at info@nwmetsgroup.com

(b) Withdrawal of Consent. Where you have provided your consent to us sharing or processing your personal data, you can withdraw your consent at any time by emailing info@nwmetsgroup.com

(c) Complaints. In the event that you wish to make a complaint about how we collect, share, or process your personal data, please contact us in the first instance at info@nwmetsgroup.com and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the supervisory authority.

Contacting NMG

This Notice may be amended from time to time, at our discretion, and this Notice (including any updates made to it) will be available []. Investors may contact NMG in order to exercise any of their rights in this Notice by contacting [] or by emailing [].

