

IMC RARE EARTHS LTD

Privacy Policy

Last updated: 25th July 2026

This Privacy Policy explains how IMC Rare Earths Ltd (the “**Company**”, “we”, “us” or “our”) collects, uses, discloses and protects personal data when you visit the IMC Rare Earths website located at imcrareearths.com (and any related or staging sub-domains) (the “**Site**”) or otherwise interact with us. Please read it together with our Cookie Policy.

1. Who We Are

IMC Rare Earths Ltd is the controller responsible for personal data collected through the Site. For privacy questions or to exercise your rights, contact us at legal@imcrareearths.com or IMC Rare Earths, Ltd., Avenida Ibirapuera, 2.033, Sala 2.02, São Paulo, Brazil.

2. Information We Collect

We collect the following categories of personal data:

- **Information you provide to us** — such as your name, email address, telephone number, company and any message content when you complete a contact or subscription form, request information, or otherwise communicate with us.
- **Information collected automatically** — such as your IP address, device and browser type, operating system, referring pages, pages viewed, and dates/times of access, collected through cookies and similar technologies (see our Cookie Policy).
- **Information from third parties** — such as analytics providers and, where relevant, information from publicly available sources.

3. How We Use Personal Data

We use personal data to: respond to your enquiries and communicate with you; provide and improve the Site and its content; send you updates or investor information where you have requested them or where otherwise permitted; maintain the security and integrity of the Site; comply with legal, regulatory and reporting obligations; and establish, exercise or defend legal claims.

Where required by law, we rely on one or more of the following legal bases for processing: your consent; our legitimate interests (such as operating and securing the Site and communicating with interested parties); performance of a contract; and compliance with a legal obligation.

4. Cookies

The Site uses cookies and similar technologies. For details of the cookies we use and how to manage them, see our Cookie Policy.

5. How We Share Personal Data

We do not sell your personal data. We may share it with: service providers and processors who support the Site and our operations (for example hosting, analytics and email providers), under appropriate

confidentiality and data-protection terms; professional advisers such as lawyers, auditors and consultants; regulators, courts and authorities where required by law; and any successor entity in connection with a merger, acquisition, financing or other corporate transaction.

6. International Transfers

The Company operates internationally, and your personal data may be transferred to, and processed in, countries other than your own, including where our service providers are located. Where such transfers occur, we take steps to ensure appropriate safeguards are in place as required by applicable law (for example standard contractual clauses).

7. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, including to satisfy legal, accounting, regulatory or reporting requirements, and then delete or anonymise it.

8. Security

We maintain reasonable technical and organisational measures designed to protect personal data against unauthorised access, loss, misuse or alteration. However, no method of transmission over the internet or electronic storage is completely secure, and we cannot guarantee absolute security.

9. Your Rights

Depending on your location and applicable law, you may have rights to: access the personal data we hold about you; request correction or deletion; object to or restrict certain processing; withdraw consent; request portability of your data; and lodge a complaint with your local data-protection authority. To exercise any right, contact us using the details in Section 1. We will respond as required by applicable law.

Region-specific notices. If you are in the European Economic Area or United Kingdom, the GDPR / UK GDPR rights above apply and you may complain to your supervisory authority. If you are a California resident, you have rights under the CCPA/CPRA, including to know, delete, correct, and to opt out of “sale” or “sharing” of personal information (we do not sell personal information). If you are in Brazil, you have rights under the LGPD.

10. Children's Privacy

The Site is not directed to children, and we do not knowingly collect personal data from children. If you believe a child has provided us personal data, please contact us and we will take appropriate steps to delete it.

11. Third-Party Links

The Site may link to third-party websites. We are not responsible for the privacy practices of those sites, and we encourage you to review their privacy policies.

12. Changes to this Policy

We may update this Privacy Policy from time to time. The “Last updated” date above indicates when it was last revised. Material changes will be posted on the Site.

13. Contact

For any questions or requests regarding this Privacy Policy or your personal data, contact legal@imcrareearth.com or write to IMC Rare Earths, Ltd., Avenida Ibirapuera, 2.033, Sala 2.02, São Paulo, Brazil.