

Privacy Policy

Identification Number POL.000.020

Effective from 13.01.2026



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Purpose

DPTU “Buchim” DOOEL Radovich is committed to protecting the privacy and personal data of individuals with whom it comes into contact through its operations and through the website www.bucim.mk.

Personal data is processed lawfully, fairly and transparently, for specific, explicit and legitimate purposes, and only to the extent necessary to achieve those purposes.

This Policy applies in accordance with the Law on Personal Data Protection of the Republic of North Macedonia and other applicable regulations, as well as the relevant internal rules and standards of the Company and the Group.

The personal data controller is:

DPTU “Buchim” DOOEL Radovich
Marshal Tito bb, 2420 Radovich
Republic of North Macedonia
Tel.: +389 (0)32 637 004
Email: contact@bucim.mk

Objectives

The purpose of this Policy is to ensure:

- lawful, fair and transparent processing of personal data;
- protection of the privacy, rights and freedoms of data subjects;
- processing only data that is appropriate and necessary for the specific purpose;
- appropriate retention, use, sharing and protection of personal data;
- transparency regarding the manner in which the Company processes personal data.

Scope

This Policy applies to personal data processed by the Company through:

- the website and contact forms;
- job applications;
- complaints and grievances;
- reports of misconduct;
- donation and sponsorship requests;
- supplier- and tender-related procedures;
- other digital or physical channels through which personal data is submitted.

The Policy applies to website visitors and users, job applicants, persons submitting requests, complaints and reports, representatives of business partners, suppliers, and other natural persons whose personal data is processed by the Company.

Additional Applicable Documents

This Policy applies in accordance with:

- the Law on Personal Data Protection and applicable secondary legislation;
- the relevant internal acts of the Company on personal data protection and information security;
- POL.000.021 Cookie Policy;
- the internal rules for handling complaints and reports of misconduct;
- other applicable regulations, internal rules and standards of the Company and the Group.

Where applicable to the specific processing activity, relevant international standards and personal data protection rules are also taken into account.

Main Text

Types of Personal Data We Collect

Depending on the purpose and method of communication, the Company may process the following categories of personal data:

- first and last name;
- email address, telephone number and address, where applicable;
- the content of messages, questions, requests, complaints and grievances;
- data contained in reports of misconduct;
- professional data, CV and other information submitted during a recruitment process;
- data submitted in donation and sponsorship procedures, including data concerning the applicant, the responsible person and the project, as well as banking, tax or other identification data where necessary for the review or implementation of the request;
- data submitted in supplier- and tender-related procedures;
- technical data related to the use of the website, device, web browser and cookies.

The Company processes only personal data that is adequate, relevant and limited to what is necessary for the specific purpose of processing.

Method of Collection

Personal data is most commonly collected: directly from the data subject; through web forms and other communication channels; through documentation submitted to the Company; and through cookies and other technical tools, in accordance with the user's choices and the Cookie Policy.

Purposes of Processing

Personal data may be processed for:

- receiving and responding to questions and requests;
- conducting recruitment procedures and, where an appropriate legal basis exists, retaining data for future employment opportunities;
- receiving and handling complaints and grievances;
- receiving, reviewing and handling reports of misconduct;



- reviewing, approving and implementing donation and sponsorship requests;
- conducting supplier- and tender-related procedures;
- entering into and performing contractual and business relationships;
- fulfilling legal, regulatory, accounting and tax obligations;
- ensuring the security, functionality and protection of the website and information systems.

Legal Basis for Processing

Depending on the specific purpose and circumstances, personal data is processed on the basis of:

- the data subject's consent, where consent constitutes an appropriate legal basis;
- compliance with a legal obligation of the Company;
- performance of a contract or taking steps at the request of the data subject prior to entering into a contract;
- the legitimate interests of the Company, where such interests are not overridden by the rights and freedoms of the data subject;
- another legal basis established by applicable regulations.

Where processing is based on consent, the data subject has the right to withdraw consent at any time, without affecting the lawfulness of processing carried out before its withdrawal.

Retention Periods

Personal data is retained only for as long as necessary to fulfil the purpose for which it was collected or for the periods established by applicable regulations and the Company's internal rules. As a rule:

- contact messages are retained for up to 12 months after the communication has ended, unless there is a legal or justified business need for longer retention;
- data from applications for a specific position is retained for the duration of the selection process and for the period necessary to fulfil applicable legal obligations;
- CVs retained for future employment opportunities are kept only where an appropriate legal basis exists and for the established period;
- complaints, grievances and reports of misconduct are retained for the duration of the procedure and thereafter in accordance with applicable legal and internal retention periods;
- unapproved donation and sponsorship requests are retained for up to 12 months from the date of the decision, unless there is a legal or justified need for a different retention period;
- documentation relating to approved donations and sponsorships, including financial and identification data, is retained in accordance with applicable accounting, tax, contractual and other statutory retention periods;
- data related to suppliers and tenders is retained in accordance with applicable legal, contractual and internal retention periods;

- data related to cookies is retained in accordance with the Cookie Policy and the settings of the relevant tools.

Upon expiry of the applicable retention period, personal data is deleted, destroyed or anonymized, unless further retention is required by law.

Sharing and Transfer of Personal Data

Access to personal data is limited to authorized persons who require such data to perform their duties.

Personal data may be shared:

- with competent state authorities and institutions, where required by law or pursuant to a lawful request;
- with authorized processors and service providers, including IT, hosting, analytics or other technical service providers, where necessary for the provision of such services;
- with other companies within the Group, where necessary for compliance, corporate governance, handling or escalation of reports, risk management or other lawful corporate purposes, and where appropriate safeguards are in place;
- with other persons where there is a legal basis or valid consent of the data subject.
- Where processing is carried out by an external processor, the Company ensures appropriate contractual and organizational measures for the protection of personal data.

Where personal data is transferred to another country or an international organization, the transfer is carried out only in accordance with the Law on Personal Data Protection and subject to appropriate mechanisms and safeguards for its protection.

Rights of Data Subjects

In accordance with applicable regulations and subject to the conditions established by law, the data subject has the right:

- to be informed about the processing of their personal data;
- to access their personal data;
- to rectify inaccurate or incomplete data;
- to erasure of personal data;
- to restriction of processing;
- to data portability, where applicable;
- to object to processing;
- to withdraw consent at any time, where processing is based on consent;
- not to be subject to a decision based solely on automated processing, including profiling, in the cases established by law;
- to submit a request to the Personal Data Protection Agency for determination of a violation of the right to personal data protection.



Security

The Company applies appropriate technical and organizational measures to ensure a level of protection appropriate to the nature of the personal data and the risks associated with its processing.

The measures are designed to protect against unauthorized or unlawful access, disclosure, alteration, loss, misuse, destruction or any other form of unlawful processing.

Particular attention is given to financial, identification and other data whose processing may present an increased risk to the rights and freedoms of individuals.

Complaints and Reporting Misconduct

Complaints, grievances and reports related to the Company's operations may be submitted through the appropriate channels, depending on the nature of the case:

Complaints and grievances: grievancebox@bucim.mk

Reports of suspected unlawful, unethical or other improper conduct: whistleblower@bucim.mk

Reports of non-compliance with the Company's legal, regulatory and internal rules and procedures: compliance@bucim.mk

All submitted complaints and reports are handled confidentially and in accordance with applicable regulations and the Company's internal acts. Access to the information submitted is limited to authorized persons, to the extent necessary to review and handle the specific case.

The identity and personal data of the person submitting a report are protected in accordance with applicable regulations and the Company's internal rules. Where permitted by applicable regulations and enabled through the established mechanism, a report may also be submitted without disclosing the identity of the reporting person.

Personal Data Protection Contact

For questions related to the processing and protection of personal data, as well as for exercising the rights set out in this Policy, data subjects may contact:

Personal Data Protection Officer

Email: dpo@bucim.mk

Telephone: 071 293 343

or through the contact form on the website www.bucim.mk.

Definitions

Term	Definition
Personal Data	Any information relating to an identified or identifiable natural person.

Data Subject	A natural person to whom the personal data relates.
Controller	DPTU “Buchim” DOOEL Radovich, which determines the purposes and means of processing personal data.
Processor	A natural or legal person that processes personal data on behalf of the Controller.
Processing	Any operation or set of operations performed on personal data, including collection, recording, organization, storage, use, transfer, restriction, erasure or destruction.

Revision History

Date	Version	Description of Change
13.01.2026	1.0	Creation
19.08.2026	2.0	Content revision and alignment with corporate guidelines, applicable legal requirements and the Company’s internal rules, with clarification of principles, responsibilities and procedures.