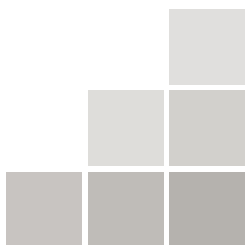


The United Basalt Products Ltd.

SUBJECT ACCESS REQUEST PROCEDURE



1. SCOPE

In this Subject Access Request Procedure, 'UBP' refers to The United Basalt Products Limited ('UBP') and all the words and expressions used in this Subject Access Request Procedure shall be interpreted and construed in line with the definitions used in UBP's General Data Protection Policy.

This Subject Access Request Procedure should be read and interpreted in conjunction with and subject to UBP's General Data Protection Policy that governs all the personal data processing activities of UBP.

All personal data processed by UBP is within the scope of this procedure.

Data subjects are entitled to obtain:

- Confirmation as to whether UBP is processing any personal data about that individual;
- Access to their personal data;
- Any related information;
- The logic involved in any automated decisions, if any, relating to him or her.

2. RESPONSIBILITIES

- 2.1 The Data Protection Officer of UBP is responsible for the application and effective working of this procedure.
- 2.2 The Data Protection Officer of UBP is responsible for handling all Subject Access Requests.

3. PROCEDURE

- 3.1 Subject Access Requests are made using the Subject Access Request Record of UBP which is available on the website of UBP.
- 3.2 The data subject who intends to make a Subject Access Request must provide UBP with evidence of his or her identity, in the form of a passport or National Identity Card.
- 3.3 The data subject must specify to UBP specific set of data held by UBP on his or her Subject Access Request. The data subject can request all data held on him or her.
- 3.4 UBP will record the date that the identification checks on the data subject were conducted and the specification of the data sought.
- 3.5 Subject to paragraph 3.6 below, UBP will provide the requested information to the data subject within one month from this recorded date.

- 3.6 That period may be extended by two further months where necessary considering the complexity of the request. UBP shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject
- 3.7 Once received, the Subject Access Request application is immediately forwarded to the Data Protection Officer of UBP, who will ensure that the requested data is collected within the specified time frame set out in paragraph 3.4 above. The collection will entail:
- 3.7.1 collecting the data specified by the data subject, or
- 3.7.2 searching all databases and all relevant filing systems (manual files) of UBP, including all back up and archived files (computerised or manual) and all email folders and archives.
- 3.8 UBP will maintain a record of requests for data and of its receipt, including dates.
- 3.9 UBP will review all documents that have been provided to identify whether any third parties are present in it, and will either remove the identifying third party information from the documentation or obtain written consent from the third party for the identity of the latter to be revealed.
- 3.10 If any of the requested data is being held or processed under one of the following exemptions, it does not have to be provided:
- National security
 - Crime and taxation
 - Health
 - Regulatory activity
 - Research history, and statistics
 - Publicly available information
 - Corporate finance
 - Confidential references
 - Management forecasts
 - Negotiations
 - Legal advice and proceedings
- 3.11 In the event that a data subject requests what personal data is being processed then UBP will provide the data subject with the following information:
- 3.11.1 the purpose of the processing;
- 3.11.2 the categories of personal data;
- 3.11.3 the recipient(s) of the information, including recipients in third countries;
- 3.11.4 how long the personal data will be stored;

- 3.11.5 the data subject's right to request rectification or erasure, restriction or objection, relative to his or her personal data being processed;
- 3.11.6 the data subject's right to lodge a complaint with the relevant supervisory authority;
- 3.11.7 information on the source of the personal data if it hasn't been collected from the data subject;
- 3.11.8 inform the data subject of any automated decision-making; and
- 3.11.9 if and where personal data has been transferred and information on any safeguards in place.

Document Owner and Approval

The United Basalt Products Limited is the owner of this document.

This document may, from time to time, be reviewed in line with any changes in the UBP's General Data Protection Policy and the law.

This Subject Access Request Procedure been duly approved by the Audit Committee of The United Basalt Products Limited.