

PRIVACY POLICY

HudBay Minerals Inc. recognizes the importance of privacy and the sensitivity of personal information. This Privacy Policy outlines how we collect, use and disclose any personal information that you may submit to us or that we may gather through your use of our website.

Personal Information We Collect

Personal information is any information that identifies you, or by which your identity could be deduced. By Canadian federal law, it does not include your name, business address, business title, professional designation(s) or business telephone number. When you contact us through the website, we will collect the following types of information from you: name, address, email, company, title, investor type, your comments and questions, and your areas of interest in our company or industry.

In addition, our website may automatically record some general information about your visit which we then use for statistical analysis to help make our website more useful to visitors. This information might include: the Internet domain for your Internet service provider, such as "company.com" or "service.ca" and the IP address of the computer accessing the website, such as "ppp-55"; the type of operating system you are using, such as Windows or Macintosh; and the date and time you visit our website and web pages that you visit on our website, along with the address of the previous website you were visiting, if you linked to us from another website (the "Analytical Purposes").

We also use "cookies" that identify you as a return visitor and which can help us tailor information to suit your individual preferences. A cookie is a piece of data that a website can send to your browser, which may then store the cookie on your hard drive.

Our goal is to save you time, provide you with a more meaningful visit and to measure website activity. Cookies do not contain any personally identifying information. Many browsers, however, allow you to disable cookie collection if you wish, or inform you when a cookie is being stored on your hard drive.

Why We Collect Your Personal Information

We collect personal information from you to respond to your enquiries, to add you to our mailing lists for updates about our company, to conduct statistical analyses of the traffic on our website and to make your use of our website more meaningful for you.

Your Consent

When you send personal information to us through the contact forms on this website or if you contact us via email, we will assume that, by contacting us and providing this information, you have given your consent to our collection, use and disclosure of such personal information for the foregoing purposes. By using our website, we shall assume that we have your consent to collect your service provider domain name, your system information and your website and Internet usage data for the Analytical Purposes.

In addition, by submitting personal information to us, you agree that we may disclose such information to third party service providers who provide administrative services to us (such as computer back-up services or archival file storage) provided that the service provider is bound by our privacy policy. You acknowledge that your personal information

may be stored on servers located outside of Canada and as a result may be accessible without notice to you or to us by governments of those foreign jurisdictions pursuant to local laws.

We do not disclose your personal information to any third party to enable them to market their products and services.

Withdrawal of Consent

If, at any time, you wish to withdraw your consent, you may contact us by emailing us at investor.relations@hbms.ca or by calling us at (204) 949-4268. If you tell us that you no longer wish to receive information from us, we will not send any further material.

Access to Your Personal Information

You may have access to any personal information we hold about you. If any of your information changes or you believe that it is incorrect, incomplete or out of date, please inform us so that we can make any necessary changes. Detailed requests that require archive or other retrieval costs may be subject to a reasonable administrative charge. Please be aware that we reserve the right to deny access to your personal information where permitted or required by law. All requests for access should be directed to our Privacy Officer at (204) 949-4268.

Is My Personal Information Secure?

We take all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are: premises security; restricted file access to personal information; deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access; and internal password and security policies. However, please be aware that email is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information.

How Long Do We Keep Your Personal Information?

We keep your personal information as long as is reasonably necessary for us to complete our dealings with you, or as may be required by law, whichever is longer.

Website Links

Our website contains links to other websites, which are not governed by this privacy policy. Use of such other websites is at your own risk.

Changes to this Privacy Policy

Since we regularly review all of our policies and procedures, we may change our Privacy Policy from time to time. Please check back often for the most current version.