

---

## SCHEDULE 16 – PRIVACY POLICY

---

Mt Malcolm Mines NL (**Company**, “we”, “us”, “our”) respects your privacy. We are committed to ensuring all information we collect or hold is handled respectfully and in accordance with relevant privacy laws including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This policy explains how and why we collect, use, hold and disclose your personal information together with your rights to access and correct that information or make a complaint about our handling of personal information.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

### 1. What is personal information?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

### 2. What personal information do we collect and hold?

The Company will only collect personal information from individuals as required to conduct our business operations. This includes when individuals use our website, apply for a position, work with us, attend our sites, invest in us or engage with us in other ways. Generally, the types of personal information we collect will include name, contact details and records of communications with us.

In addition, we collect personal information relating to:

- (a) shareholders: information about the shareholding, banking details and tax file numbers for payment of dividends and other amounts; and
- (b) job applicants: employment and academic histories, the names of referees and in some cases, limited health information based on testing undertaken by or for us. We will collect this information directly from organisations that provide recruitment related services to us and from third parties who provide job applicants with professional or personal references.

We will also collect personal information, including names and contact details about:

- (a) people involved in or through organisations that we support or sponsor;
- (b) our suppliers: this information is collected for business-related purposes but contains some limited personal information contact details of the people that we deal with;
- (c) people who correspond with us, including through our website, in which case we may keep a copy of that correspondence and relevant contact details;
- (d) people who request information updates about us through our website mailing list.

We may collect information about how you access, use and interact with the website. This information may include:

- (e) the location from which you have come to the site and the pages you have visited; and
- (f) technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

We use cookies on the website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

### **3. Why do we collect, hold and use your personal information?**

We may use personal information for the primary purpose for which it is collected (e.g. provision of our services, including administration of our services) or for secondary purposes which are related (or directly related to the case of sensitive information) to the primary purpose.

We collect, hold and use your personal information so that we can:

- (a) comply with our legal obligations and assist government and law enforcement agencies or regulators;
- (b) communicate with, and comply with our legal obligations to, our shareholders, and to process payments to them;
- (c) enable third party service providers to produce us and our related companies with services such as information technology, auditing, legal advice, printing and mailing services, and services related to our share register;
- (d) correspondence with people who have contacted us, and deal with feedback;
- (e) provide services to, and manage, our related companies;
- (f) correspond with people regarding our corporate sponsorships;
- (g) consider applications from prospective employees or contractors;
- (h) maintain and update our records;
- (i) conduct or participate in investigations or due diligence;
- (j) facilitate transactions involving the Company or any of our affiliates;
- (k) manage our operations (including safety and security);

Where appropriate, we will confirm your express consent before collecting such information.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

#### **4. How do we collect your personal information?**

We will collect your personal information directly from you whenever you interact with us.

We may collect information from third parties – for instance, information regarding shareholders is collected from our share registrar, and information about job applicants is collected in the manner set out above.

#### **5. How do we store and hold personal information?**

We store most information about you in computer systems and databases operated by either us or our external service providers.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure. Processes including taking steps to restrict access to databases, maintaining firewalls, encrypting data, using secure servers in controlled facilities and only allowing access by those entrusted with authority and computer network passwords. We also require all employees to comply with information security policies and attend training. In addition, we monitor and regularly review our practices against industry best practice.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

However, the internet is not a secure environment and no computer system is perfectly secure. Although all care is taken, we cannot guarantee the security of information provided to us. This means that there is always a risk that your personal information may be accessed or used without authorisation.

#### **6. Who do we disclose your personal information to, and why?**

We may transfer or disclose your personal information to our related companies.

We may disclose personal information to external service providers (including IT service providers, auditors, legal advisors, mail houses and our share registrar) so that they may perform services for us or on our behalf.

We may also disclose your personal information to others outside our group of companies where:

- (l) we are required or authorised by law to do so;
- (m) you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- (n) we are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our assets or business changes, we may transfer your personal information to the prospective or new owner.