

# PRIVACY POLICY

## 1. PURPOSE

BCI Minerals Limited and its subsidiaries (**Company**) are committed to protecting the privacy of individuals' personal information. 'Personal information' is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not and whether the information or opinion is recorded in a material form or not.

The Company is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles as contained in Schedule 1 of the Privacy Act (**APPs**). The APPs provide guidelines for the collection, use, storage, security and disclosure of personal information (including sensitive information). The Company respects the right of individuals to know and, where possible, have access to their personal information stored by the Company and also update and amend that information when it is incorrect.

This policy sets out the principles that the Company follows in collecting, using, holding, disclosing and otherwise managing personal information.

## 2. SCOPE

This policy applies to all Company offices, operations and sites under the scope of the Privacy Act.

## 3. RESPONSIBILITY

All employees, officers, directors and contractors of the Company (**BCI Employees**) must comply with this policy and act in accordance with this policy as if they were the 'Company'.

## 4. COLLECTION AND USE OF PERSONAL INFORMATION

The Company collects personal information only when it is reasonably necessary for the purpose of conducting the Company's functions and business activities. The Company may also be required to collect personal information under superannuation, taxation, occupational health and safety laws, as well as under insurance laws and under the Company's insurance policies and for immigration and customs purposes and other regulatory authorities.

Examples of the personal information that the Company collects, include an individual's:

- Name;
- Gender;
- Contact details (such as email address, phone number or address);
- Photographic identification;
- Date of birth;
- Employment history;
- Medical history or information;
- Payroll information including bank details; and

- Professional qualifications.

The Company may also collect individuals' personal information in order for individuals to receive business information from the Company, for instance, where individuals subscribe to the Company's newsletter regarding shareholder information.

An individual's personal information is generally collected by the Company either in person, over the phone, through email or through the Company's website.

The Company will in general collect personal information about an individual directly from that person, but on occasions the Company may need to collect personal information from third parties, such as recruitment agencies, referees and health providers. If required by law, the Company will seek the consent of the individual to collect personal information from third party sources.

#### **4.1 Security of Personal Information**

The Company holds personal information both electronically and in hard copy. The Company will take all reasonable steps to keep all personal information secure and protected from loss, misuse or unauthorised access, modification or disclosure. This is done through the practice of appropriate security procedures relating to storage of hard copy documents or electronic data. If the Company no longer requires the personal information in its possession, the Company will take reasonable steps to destroy or permanently de-identify it.

A data breach will be handled in accordance with the Company's guidelines and procedures for cyber security including any Data Breach Response Plan.

#### **4.2 Collection of Sensitive Information**

The Company will not collect sensitive information about an individual (meaning information that reveals an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a trade union, details of health, disability, sexual orientation, or criminal record), without the individual's consent, unless required by law.

#### **4.3 Anonymity**

The Company may in some circumstances allow for personal information to be de-identified, at the request of the individual. However, where the personal information is required for the purpose of conducting the Company's business, the individual's request may not be able to be met.

### **5. DISCLOSING PERSONAL INFORMATION**

Any personal information provided to or collected by the Company about an individual is used solely for the purpose for which it was given or collected. The Company may share personal information with its service providers, subcontractors, employees, insurers and professional advisors as is reasonably necessary for the conduct of its business, or for other purposes set out in this policy. Where sharing personal information is not reasonably necessary for the conduct of the business or as otherwise set out in this policy, the information will not be shared or given to any third parties, unless there is consent to the use or disclosure of that information or where the Privacy Act exemptions may apply.

## 5.1 Disclosure of Personal Information to Overseas Recipients

Disclosure of personal information to overseas recipients is unlikely. However, where personal information is disclosed to overseas recipients, such disclosure will be in accordance with the terms of this policy and the APPs (including by obtaining consent of the individual, if required).

## 6. ACCESS AND AMENDMENT OF PERSONAL INFORMATION

The Company is committed to providing an individual with access to the personal information that the Company collects about that individual, wherever possible. An individual may request access to their personal information by sending a request to our Privacy Officer at [legal@bciminerals.com.au](mailto:legal@bciminerals.com.au) using the form Request to Access Personal Information.

The Company aims to ensure that all personal information is accurate, complete and up to date. Where an individual believes the personal information held by the Company is incorrect or inaccurate, then the individual may request the amendment of their personal information by sending the request to the Privacy Officer at [legal@bciminerals.com.au](mailto:legal@bciminerals.com.au) using the form Request to Amend Personal Information.

In certain circumstances set out in the Privacy Act, the Company has the right to refuse individuals' access or amendment of their information. Where the Company refuses such access or amendment, the Company will notify the individual of the Company's decision and its reason for doing so. The Company may seek to recover reasonable costs associated with providing the individual with access to or correction of their personal information.

## 7. COMPLAINTS

The Company takes all complaints seriously. Individuals can contact the Company's Privacy Officer at [legal@bciminerals.com.au](mailto:legal@bciminerals.com.au) with regards to any complaints about any privacy issue. Complaints will be dealt with internally and resolved within a reasonable time frame.

Where an individual believes that the Company has not handled a request regarding their personal information appropriately or have a complaint regarding their privacy, then the individual is able to lodge a complaint with the Office of the Australian Information Commissioner via its website at <https://www.oaic.gov.au/>, by emailing [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or calling 1300 363 992.

## 8. BREACH OF POLICY

Breach of this policy by a BCI Employee may lead to disciplinary action being taken against the BCI Employee or relevant personnel, including dismissal in serious cases or in the case of a contractor, termination of a contractor's contract.

## 9. REFERENCES

The following documents should be read in conjunction with this policy:

- Management of Personal Information Standard
- Procedure for Requests relating to Personal Information
- Request to Access Personal Information
- Request to Amend or Remove Personal Information

## 10. CONTACT US

### Privacy Officer

Email: [legal@bciminerals.com.au](mailto:legal@bciminerals.com.au)

## DOCUMENT CONTROL

Version	Date	Description	Author	Approver
A	20/06/2019	Privacy Policy	S. Majteles	Board
0	25/06/2020	Privacy Policy	S. Majteles	Board
1	24/08/2022	Privacy Policy	S. Majteles	Board