

## 1. Purpose

This Privacy Policy applies to Ora Banda Mining Limited and its wholly owned subsidiaries (OBM).

In this Privacy Policy, **we, us, our** is a reference to OBM or its subsidiaries, as applicable. It outlines how we collect, use, disclose and hold personal information of individuals who engage with us, including representatives of our suppliers, customers, employees, shareholders and users of OBM's website. It also sets out how you can access and update your personal information or make a complaint.

## 2. Type of information we may collect

"Personal information" is information or an opinion about an individual that identifies that individual or from which an individual is reasonably identifiable, and includes information such as the individual's name, postal or email address, phone numbers, billing information, medical details, credit history (for current and potential suppliers and customers), employment history (for employees and job applicants) as well as other information contained in communications with us.

"Sensitive information" is a type of personal information that includes sensitive matters about an individual such as health information, criminal record and racial or ethnic origin. We may collect sensitive information about individuals visiting our premises or sites, or if the individual is an employee or job applicant, but will only do so with their consent or otherwise in accordance with the *Privacy Act 1988* (Cth) (Privacy Act).

## 3. How we collect personal information

We may collect personal information in a number of ways, including:

- a) directly from you, including by telephone, through written correspondence (such as letters and emails), tenders, enquiry forms, job applications, share subscriptions in OBM, contractual documents and in person if you visit our share registry, premises or sites;
- b) if it is unreasonable or impracticable to collect it directly from individuals, we may collect it indirectly from third parties including credit reporting agencies, suppliers and government agencies, or from publicly available sources of information, including address validation software and telephone directories.

Personal information which we may collect through our website ([www.orabandamining.com.au](http://www.orabandamining.com.au)) (Website) includes:

- a) any messages, email address or comments a Website user leaves for OBM via the Website; and
- b) information provided by a Website user when applying for employment or submitting a tender or other enquiry at OBM via the Website.

In addition, if individuals access our Website, our system may record certain information including the following which will be used for statistical and reporting purposes as well as for website administration and maintenance:

- a) the date and time of your visit to the website; and
- b) the pages accessed and any information downloaded.

#### 4. Purposes of collecting personal information

OBM collects personal information that we reasonably need to manage our business activities and operations and to comply with applicable laws. If we are unable to collect personal information, we may not be able to do the things described below, including communicating with you or processing your request or job application.

Specifically, we collect, use, store and disclose this personal information to:

- a) ensure safety and security at our premises and sites;
- b) communicate effectively with relevant individuals;
- c) protect and enforce our legal rights and obligations;
- d) maintain our relationships with customers, shareholders, suppliers and other stakeholders;
- e) manage employment matters including work health and safety aspects;
- f) maintain appropriate records of our shareholders, employees and contractual counterparties;
- g) conduct or participate in investigations or due diligence;
- h) enable third parties to provide services to OBM which are necessary for OBM to conduct its business including audit, financing, insurance, marketing, recruitment and professional advisory services;
- i) facilitate transactions involving OBM or its affiliates;
- j) respond appropriately to regulatory queries;
- k) recruit and train employees;
- l) conduct credit checks and assess creditworthiness of our suppliers and other counterparties;
- m) comply with our legal and regulatory obligations;
- n) enable other purposes required or authorised by law, including purposes for which you have provided your consent; and
- o) to keep employees and other individuals and organisations informed of our activities, events, ASX announcements and other matters, including by e-mail or other electronic form – if you do not wish to be contacted for those purposes, please inform us using the contact details given below.

#### 5. Shareholders

If you are a shareholder, the *Corporations Act (2001)* (Cth) (**Corporations Act**) requires us to collect information about your name, address and shareholding, and include this in our register held by Computershare Investor Services Pty Ltd (**Computershare**). This information will continue to be included in the register for 7 years after you cease to be a shareholder.

The Corporations Act also requires us to grant access to anyone to inspect our share register on request and under certain circumstances, to obtain a copy. We may also provide information from the share register to meet specific requests, such as identifying OBM's top 20 shareholders.

You may also be required to provide us with your tax file number, financial institution account details and/or bank account details. To comply with Australian tax laws, we also provide certain information to the Australian Tax Office, including regarding any dividends we pay to you.

Under the *Money and Laundering and Counter Terrorism Financing Act 2006* (Cth), Computershare may collect personal information about you (such as your legal name and other names you may be known by, your residential street address and your date of birth) and hold other documents in order to verify your identity. This information is generally not included in the public register and is restricted to authorised Computershare employees, OBM and regulators.

## 6. Disclosure of personal information

For the purposes described in this Privacy Policy or otherwise permitted by law, OBM may share personal information to other parties in connection with the operation and administration of OBM's business, including:

- a) any of OBM's related bodies corporate;
- b) our business and joint venture partners;
- c) our suppliers, service providers, professional advisors, accountants, auditors, recruiters, and legal advisors;
- d) financial institutions for payment processing;
- e) government and regulatory authorities, where required or permitted by law;
- f) third parties (including medical professionals) to respond to an emergency; and
- g) where an individual to whom the personal information relates has otherwise consented.

Where OBM no longer requires the personal information of an individual for one of the purposes outlined in this Privacy Policy, OBM will take reasonable steps to destroy or de-identify that information, subject to any legal obligation to keep the information for any required period of time.

## 7. Security of personal information

We store information in different ways, including in hard copy and electronic form.

We have implemented physical and electronic controls around technology and our organisation processes to assist us in protecting collected personal information from misuse, unauthorised access, loss, modification or disclosure. This includes having in place confidentiality requirements from our employees, document storage security policies, systems and site access restrictions and requiring third parties to satisfy identification requirements.

## 8. Assessing and correcting personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to correct any inaccurate or out of date information. We will respond to all such requests within a reasonable time. For security reasons, we may require that you put your request in writing, and we may need to verify your identity before providing access to your personal information.

In some circumstances, we may not be able to provide you with all personal information we have about you, including where a legal exemption applies or where providing such information may compromise the privacy of others. If we cannot provide you access, we will tell you why.

OBM will take all reasonable steps to make sure that the personal information we collect, use, and disclose is complete, accurate and up-to-date. If you believe that the personal information we hold about you is incorrect, please contact us and we will take reasonable steps to correct this information.

## 9. Disclosure of personal information to overseas recipients

It is unlikely that OBM will disclose collected personal information to overseas recipients. Any such disclosure by OBM would comply with the Privacy Act. If you do not wish for your collected personal information to be disclosed to overseas recipients, please let us know.

## 10. Queries or complaints

If you have any questions, concerns or complaints about this Privacy Policy or how we handle collected personal information, please contact our Privacy Officer:

Mail:                   The Privacy Officer  
                          Ora Banda Mining Limited,  
                          Level 2, 1 Hood Street,  
                          Subiaco WA 6008

Telephone:       +61 8 6365 4548 between 8.30am and 5pm (Perth time) Monday to Friday

Email:               [privacy@orabandamining.com.au](mailto:privacy@orabandamining.com.au)

We will endeavour to respond as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 11. Policy review

OBM reserves the right to revise this Privacy Policy from time to time, without notice to you. A copy is available on our website at [www.orabandamining.com.au](http://www.orabandamining.com.au)