



Sierra Rutile

Privacy Policy

Sierra Rutile Holdings Limited

ACN 613 822 165

Adopted by the Board with effect from 27 July 2022

1 What is this Policy about?

Sierra Rutile Holdings Limited and its related bodies corporate (**we, us, our**) recognise the importance of privacy and is committed to respecting individual privacy and protecting personal information. We are bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and other privacy laws. Some of these laws contain exemptions in certain situations, and we may rely on those exemptions where applicable. For example, the Privacy Act includes an exemption for the handling of employee records in some circumstances.

This Privacy Policy describes how we collect, use and manage personal information.

Personal information means information about an identified individual, or an individual who is reasonably identifiable from that information, whether the information is true or not.

2 How we collect personal information

We may collect personal information in a number of ways, including directly from individuals, through records of communications and activity (e.g. security cameras at our sites), from third parties such as related companies and your organisation, colleagues and representatives (see also the parties described under section 6 'Disclosure of the information we collect' below), and from publicly available sources. We may collect personal information in writing, by telephone, online and through other methods of communication.

3 Types of personal information we collect

We may collect current and historical personal information including information about your name, contact details, identification, organisation, employment, positions held, forms submitted, payment details and enquiry/complaint details. We may also collect personal information relating to your dealings with us.

If you hold an investment in our company, we may also collect details of your investment. Some personal information may be collected under laws including the *Income Tax Assessment Act 1997* (Cth) (**ITAA 1997**), *Income Tax Assessment Act 1936* (Cth) (**ITAA 1936**) and the *Corporations Act 2001* (Cth) (**Corporations Act**).

If you apply for a position with us, we may also collect information about your qualifications, skills, experience, character and background checks (including health, reference, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks). In addition, if you join our staff, we may collect information relating to your current or former employment or engagement including information about your training, disciplining, resignation, termination, terms and conditions, staff benefits, emergency contact details, performance, conduct, use of our IT resources, payroll matters, union or professional/trade association membership, recreation, drug/alcohol tests, leave and taxation, banking or superannuation affairs. Some of this personal information may be collected under laws including the *Fair Work Act 2009* (Cth), *Superannuation Guarantee (Administration) Act 1992* (Cth), ITAA 1936, ITAA 1937 and other tax laws, Corporations Act, occupational health and safety laws and workers compensation laws.

4 Purpose of collection of personal information

Where we collect, use and disclose personal information, we generally do this for the purposes of operating our business. For example, personal information may be collected and used for managing occupational health and safety issues, recruitment, training and managing staff, maintaining and updating our records, communicating and managing our relationships with stakeholders including our staff, investors, suppliers and business contacts and facilitating acquisitions and potential acquisitions of our business or other businesses by us.

5 Security of information

The secure storage of any personal information that we collect – whether in electronic or physical form, and whether held by us or our service providers – is a priority. We take reasonable steps to protect personal information from misuse, loss, modification or unauthorised access. Our security measures may include, depending on the circumstances, firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from accessing the information that you provide to us, and we to you. However, please be aware that there are inherent risks in transmitting information by use of the Internet and other online or electronic transmission systems and that we cannot guarantee the security of information transmitted in this way.

6 Disclosure of the information we collect

We may disclose personal information to our related entities and third parties which may include your representatives and to service providers in relation to which we outsource some of our important administrative functions including share registry, mailing, information technology, auditing, accounting, legal, business consulting, information broking, research, investigation and insurance services.

If you apply for a position with us, we may disclose your personal information to academic institutions, recruiters, background check providers, health service providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers. In addition, if you join our staff, we may disclose your personal information with your representatives (including unions), other employers seeking a reference about you and our service providers including providers of payroll, superannuation, banking, staff benefits, surveillance and training services.

7 Transfer of your personal information to other countries

In some cases we may disclose your personal information to an overseas recipient – for example, to a related entity or third party contractor based overseas.

8 Accuracy of personal information

We endeavour to keep any personal information collected, used and disclosed accurate, complete, up-to-date, relevant and not misleading. If personal information changes, or if you believe our records are not accurate, please contact our General Counsel & Company

Secretary (**GC&CS**) (see section 10 below) and we will take steps to update and correct the information held in our records promptly.

9 Access

You have a right to access personal information, subject to some exceptions allowed by law. If you would like to do so, please contact us by sending an email to our GC&CS. We may charge an administrative fee for searching for and providing access to information if this is permitted under the Privacy Act.

10 Contacting us

If you have any questions or complaints about your privacy, please contact our GC&CS between 9.00 am and 5.00 pm WST, Monday to Friday or by sending a letter to the GC&CS. We will take all reasonable steps to look into and address the complaint in a prompt manner.

11 Review of Policy

This Privacy Policy may be updated from time to time. When appropriate, a revised Privacy Policy will be made available which will incorporate any changes. We recommend reviewing the latest Privacy Policy when engaging with us or submitting personal information to us.