

1 PURPOSE

BCI Minerals Limited and its subsidiaries and affiliates (“the Company”) are committed to protecting the privacy of individual’s 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.

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

2 SCOPE

This policy applies to all Company offices, operations and sites.

3 DEFINITIONS

| Term | Definition |
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| APP | Australian Privacy Principles as contained in Schedule 1 of the <i>Privacy Act 1988</i> (Cth) |
| BCI Employees | Employees officers, directors and contractors of the Company |
| Company | BCI Minerals Limited and its subsidiaries |
| Company Secretary | The person appointed in the role of Company Secretary, as notified by the Company to the Australian Securities and Investments Commission from time to time |
| Data Breach | When personal information held by the Company is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference. |
| DBRP | Data Breach Response Plan |
| OAIC | Office of the Australian Information Commissioner |
| personal information | Information, or an opinion about, an individual whose identity is reasonably identifiable, whether true or not. Examples of personal information can include an individual’s: <ul style="list-style-type: none"> • Name; • Gender; • Contact details; • photographic identification • Date of birth; • Employment history; • Medical history or information; • Payroll information including bank details; • Professional qualifications. |
| Privacy Act | <i>Privacy Act 1988</i> (Cth) |
| Privacy Officer | General Counsel or such other person designated by the Remuneration and Nomination Committee from time to time |

4 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’.

5 CONTENT

5.1 The Privacy Act

The APPs set out in the Privacy Act apply to private sector organisations with certain annual turnover amounts. The Company is bound by the Privacy Act and these APPs.

The APPs provide guidelines for the collection, use, storage, security and disclosure of personal and sensitive information. The Company respects the right of individuals to know and have access to their personal information stored by the Company and also amend that information when it is incorrect.

6 Collection and Management 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.

Due to the Company being comprised of different business units and entities, the Company may need to disclose personal information between each other in order to conduct business.

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 holds personal information both electronically and in hard copy.

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.

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 procedures relating to storage of hard copy documents or electronic data.

6.1 Collection of Sensitive Information

The Company will not collect sensitive information about an individual that reveals their 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.

6.2 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 met.

6.3 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. This information will not be shared, sold 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.

6.4 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, consent of the individual will be obtained (if required by law) and such disclosure will otherwise be in accordance with the terms of this policy.

6.5 Access, Amendment and Removal 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 the Privacy Officer at 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 or is no longer required by the Company, then the individual may request the amendment or removal of their personal information by sending the request to the Privacy Officer at legal@bciminerals.com.au using the form Request to Amend or remove Personal Information.

The Company will consider whether the access, amendment or removal of the information is appropriate or reasonable and will notify the individual of the Company's decision.

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.

6.6 Complaints

The Company takes all complaints seriously. Individuals can contact the Privacy Officer at 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.

6.7 Data Breach

The Company takes all reasonable technical and organisational security measures to protect personal information from accidental loss and unauthorised access, destruction, misuse, modification or disclosure. A

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

7 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.

8 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.