

SYMBOL MINING LIMITED
161 989 546
(COMPANY)

PRIVACY POLICY

1.1 Policy:

This policy statement outlines how the organisation manages the personal information held about customers and others. The organisation's privacy policy is based on transparency and the organisation is committed to being open about how personal information is used. Where documents ask for personal information, it will generally state the purposes for its use and to whom it may be disclosed.

"Your privacy is important to the organisation!"

1.2 What is your personal information?

When used in this policy, the term "personal information" has the meaning given to it in the Commonwealth *Privacy Act 1988 (Act)*. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

1.3 Record Keeping

The organisation maintains records of:

- Employees, Shareholders, Customers, Suppliers and Contractors.
- Registered consultants / agents contracted to market company products to potential customers on behalf of the organisation.
- Personal information to meet legal requirements.

1.4 Information Requested

- The nature of the services provided determines the range of personal information we require from our personnel.
- The organisation obtains most of the information directly from personnel through registration forms.
- The organisation may ask for other information voluntarily from time to time (for example, through surveys) to enable the organisation to improve their services or consider the wider needs of their personnel.
- If personnel choose not to provide the information required to best address their and the organisation's needs, the organisation may decide not to start or continue a business relationship with the person.

1.5 **Information Use and Disclosure**

- The organisation collects, holds, uses and discloses personal information to perform its business function, fulfil legal obligations, and ensure personnel safety.
- Shareholder information is used for purposes including convening shareholders meetings, maintaining statutory members registers, communicating with shareholders, fulfilling statutory obligations to provide copies of members registers to requesting parties and providing information to ASX or ASIC in relation to regulatory matters.
- Depending on the circumstance and particular restrictions on sensitive information, personal information may be disclosed:
 - In statistical form where the individual is not identified.
 - Where legislation requires the organisation to report information.
 - When required by law.
 - In situations where harm to a person or substantial property is imminent and release of the information might avert such harm.
- It is recognised that the transfer of information collected by or transferred to a third party in Australia may occur as part of the normal operations of the organisation. This could be:
 - The collection and transfer of information by associates involved in logistical management on behalf of the organisation.
 - The transfer of information to and from a business partner or recruitment agent.
 - The provision of information to the Australian Immigration Office or the Nigerian Embassy with respect to visa processing.
 - Reporting required by legislation.
- The transfer of this information would form part of the necessary process for the performance of the contract between customers / suppliers and the organisation.
- We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

1.6 **Sensitive information**

- Some personal information we hold is sensitive. Sensitive information can relate to a person's racial or ethnic origin, tax file number, state of health, medical and or employment history.
- The way the organisation uses tax file numbers is restricted by law.
- Sensitive information is needed to satisfy legislative requirements and to provide support services that may be required.

1.7 **Information Storage**

- Safeguarding the privacy of information is important to the organisation, whether interaction takes place personally, by phone, mail, over the internet or other electronic medium. The organisation holds personal information in a combination

of computer storage facilities and paper-based files and steps are taken to protect the personal information held from misuse, loss, unauthorised access, modification or disclosure.

- The organisation may need to maintain records for a significant period of time. However, when information is no longer needed and required, all records will be securely destroyed.

1.8 ***Notification of Data Breaches***

- The organisation must notify individuals where their personal information is involved in a data breach that is likely to result in serious physical, psychological, emotional, financial, or reputational harm to the person, subject to a number of exceptions.
- A data breach involves unauthorised access to, or unauthorised disclosure of, personal information, or a loss of personal information.
- The notification must include recommendations about the steps individuals should take in response to the breach. The Australian Information Commissioner must also be notified of eligible data breaches.

1.9 ***Accuracy of Information***

- The organisation endeavours to ensure that the personal information held is accurate and current. The organisation realises that information changes frequently with changes of address and other personal circumstances so the accuracy of the information depends to a large extent on the information provided. The organisation can generally update personnel information over the telephone or via e-mail. Employees should ensure that their personal details held by the organisation are accurate by notifying the HR department of any changes.
- Individuals have the right to check what personal information about you is held. Under the Act, people have the right to obtain a copy of any personal information which the organisation holds about them and to advise the organisation of any perceived inaccuracy. The Act does set out some exceptions.
- To make a request, the individual will need to complete an application form verifying his/her identity and specifying what information is required.
- The organisation will acknowledge such a request within 14 days and respond promptly to it. A fee may be charged to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.
- There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal except to the extent it would be unreasonable to do so.
- If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it at no cost to you. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal

information stating that you disagree with it and will give you written reasons for any refusal except to the extent it would be unreasonable to do so.

1.10 Complaints and / or contact details

- To make a complaint or to contact the organisation regarding its Privacy Policy or practices, please contact the Managing Director of the organisation in writing at:

Symbol Mining Limited
Unit 6, 331 – 335 Hay Street
Subiaco WA 6008

1.11 Procedure:

- All information recorded or obtained must adhere to above Policy.