



PRIVACY POLICY

1, OVERVIEW

Metro Mining values and respects the privacy of the people that we deal with. We are committed to protecting your privacy and complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) and any other applicable privacy laws and regulations.

We collect Personal Information from a range of individuals in the context of our business activities including our People, job applicants, representatives of our suppliers, customers, contractors, shareholders, users of our website and visitors to our operational and office sites.

"Our People" includes our directors, employees, future employees and contractor staff (e.g. labour hire, temporary or agency staff, trainees, work experience students, secondees).

This Privacy Policy ("Policy"):

- relates to "**Personal Information**", which is any information (including an opinion) about an identified or identifiable person; and
- explains how we collect, manage, and use Personal Information, and how you can exercise your privacy rights.

2, QUICK LINKS

Please read this Policy in full to ensure you are fully informed. However, if you only want to access a particular section of this Policy, then you can click on the relevant link below to jump to that section:

- [Who does this Policy apply to?](#)
- [How do we collect Personal Information?](#)
- [What Personal Information do we collect about you and why?](#)
- [Cookies Notice](#)
- [How do we hold Personal Information?](#)
- [How do we disclose Personal Information?](#)
- [Will my Personal Information be disclosed overseas?](#)
- [What rights do I have and how can I exercise them?](#)
- [Who can I contact if I have a question or a complaint?](#)

3, WHO DOES THIS POLICY APPLY TO?

This Policy applies to Metro Mining Limited, its subsidiaries, and its operated or controlled joint ventures (together, "**Metro Mining**", "**we**" or "**us**"). We require our People to follow this Policy, as well as those of our Suppliers authorised to manage Personal Information on our behalf.

4, HOW DO WE COLLECT PERSONAL INFORMATION?

Broadly speaking, we collect Personal Information about you in the following ways:

4.1 Information that you provide voluntarily

At times, Metro Mining may ask you to voluntarily supply Personal Information. For example, we may ask you to provide your contact details when you submit enquiries to us through the Keep In Touch page on our website or ask to receive information from us. We may also collect Personal Information during the course of our business



interactions with you, including from any communications you send us.

4.1 Information that we collect automatically

When you visit our website, we may collect certain information automatically from your device. Specifically, we may collect information like your device type, unique device identification numbers, browser-type, broad geographical location and other technical information from you.

We use this information for our internal operations and analytics purposes and to improve the quality and relevance of our website. Some of this information may be collected using cookies and similar technology. Please see section 6 below for further information on our use of cookies.

4.2 Information that we obtain from third party sources

In some cases, we may collect Personal Information about you from publicly available sources or from a third party, such as through your representatives, contractors who provide services to us, or other third parties who are entitled to share that information. In addition, where you have expressed an interest in career opportunities with Metro Mining, we may obtain Personal Information provided to us by HR practitioners, hiring managers and recruitment advisors.

5, WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU AND WHY?

The Personal Information we may collect depends on our relationship with you.

Personal information can extend to any information where you can be identified directly or indirectly, in particular by reference to an identifier (for example, a name or email address, or an online identifier such as a unique device identification number).

The table at **Appendix A** of this Policy sets out a list of the types of information we collect and why we use it.

We may collect other Personal Information from time to time where you provide it to us, as necessary for our business requirements, or in order to comply with applicable laws. It will be made clear to you at the point of collection the type of data we require and the reasons for collecting it.

Where it is lawful and practicable for us to allow it, you have the right not to identify yourself when dealing with us. However, if you don't provide us with your Personal Information, it may impact on our ability to interact with you.

Please note that other third-party websites and social media may be accessible via hyperlinks from the Metro Mining website. These websites are owned and operated by third parties.

Metro Mining has no control over the content of those other websites and social media platforms, and these websites will not be subject to our Privacy Policy. We encourage you to review the separate privacy policies for these websites and platforms before using them to understand how such third parties collect, manage, and use your Personal Information. Metro Mining cannot be responsible for your use of such third-party websites and features.

6, COOKIES NOTICE

6.1 What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website to track the number of visitors to our website, collect information (where available) about your computer or mobile device for system administration purposes, to evaluate our website's effectiveness and



improve your experience.

Cookies set by the website owner (in this case, Metro Mining) are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Metro Mining does not use any third-party cookies.

6.2 Why do we use cookies?

We use first party cookies for several reasons. Some cookies are required for technical reasons for our websites to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our websites. This information is used anonymously and in aggregate and is collected and logged for statistical purposes. Cookies are not used by us to identify who you are or to send you advertising.

6.3 How can I control cookies?

You have the right to decide whether to accept or reject cookies. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and certain areas of our website may be restricted. As the way by which you can refuse cookies through your web browser controls varies from browser to browser, you should visit your browser's help menu for more information.

7, HOW DO WE HOLD PERSONAL INFORMATION?

We may hold your Personal Information in electronic or in hard copy form. We may keep this information at our own premises, or at sites managed by our service providers.

We are committed to keeping your Personal Information safe, confidential, and secure. We use a range of physical, electronic and procedural safeguards to do this. We update these safeguards from time to time to address new and emerging security threats. We also train our People on privacy matters as appropriate and seek to limit access to Personal Information to those of our People who need to know that information.

7.1 Retention of Personal Information?

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a product or service you have requested, or to comply with applicable legal, tax or accounting requirements).

Metro Mining's aim is to keep your Personal Information for no longer than is necessary for compliance or other legitimate business purposes. We apply our standard document retention and disposal procedures and processes to records that include Personal Information. These procedures and processes take account of document retention requirements imposed by law in the jurisdictions where we operate. For more information on our document retention practices please contact us using the details below contained in this Policy.

8, DO WE DISCLOSE PERSONAL INFORMATION TO THRID PARTIES?

In appropriate circumstances, we may disclose your Personal Information to the following categories of third parties:

- auditors, legal and other professional advisers and share registries;
- IT and other service providers;
- government and law enforcement authorities;
- financial institutions;
- HR practitioners, hiring managers and recruitment advisors (including relevant to Personal Information provided to us via our job vacancy website and for the purpose of considering you for career opportunities with Metro



Mining);

- other third parties where disclosure is required by law; and
- to any other person with your consent to the disclosure.

We take reasonable steps to protect the confidentiality and security of your Personal Information when it is disclosed to a third-party and seek to ensure the third-party deals with your information in accordance with our instructions, applicable privacy laws, and only for the purpose for which it is disclosed.

9, WILL MY PERSONAL INFORMATION BE DISCLOSED OR TRANSFERRED OVERSEAS?

In some cases, the third parties to whom Metro Mining may disclose your Personal Information may be located outside your country of residence (for example, in a cloud service, system or server), and may be subject to different privacy regimes. This includes our own related entities.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained.

For more information on the transfer of Personal Information and the safeguards Metro Mining has in place, please contact us using the details below contained in this Policy.

10, WHAT RIGHTS DO I HAVE AND HOW CAN I EXERCISE THEM?

You can request access to your Personal Information held by us, or request that it be updated or corrected, at any time, by contacting us at the details below.

You may remove any Personal Information you provided to us via Metro Mining's job vacancy website at any time by contacting us via careers@metromining.com.au.

You can also opt out of any marketing communications we send you at any time. You can exercise this right by following the unsubscribe instructions on such communications.

To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity.

We will not charge you a fee for responding to an access or correction request, but you may be charged the reasonable expenses we incur (for instance extraction, search and copying costs), unless we are required under applicable law to provide the information free of charge. We will inform you of this before proceeding.

We will respond to any access request within a reasonable time (usually 30 days or as otherwise required by applicable law). There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

11, WHO CAN I CONTACT IF I HAVE A QUESTION OR A COMPLAINT?

If you have a question, concern, or complaint regarding the way in which we handle your Personal Information, or if you believe that Metro Mining has failed to comply with this Policy or breached any applicable laws in relation to the management of that information, you can make a complaint.

Any question, concern or complaint should be made in writing to:

By email: cosec@metromining.com.au



By mail: Company Secretary
 Metro Mining limited
 Suite 2, Level 4, 135 Wickham Terrace Spring Hill QLD 4000

Metro Mining will review and respond to your question, concern or complaint as soon as possible, generally within 30 days of receiving it.

If you are not satisfied with our response, you can refer your complaint to the relevant data protection authority with jurisdiction over the relevant matter (in Australia, this is the Office of the Australian Information Commissioner (OAIC)).

Contact details can be found at the OAIC's website: www.oaic.gov.au. For more information of who to contact please see the Privacy section of our website.

APPENDIX A: TYPES OF INFORMATION WE COLLECT AND WHY WE USE IT

The following table sets out a list of the types of information / data we may collect and why we use it.

Data / Information Type	Why do we use this information?	Legal Basis
Shareholders / Investors (existing or prospective)		
Identification information: such as, passport; image; national identification.	To verify your identity, undertake adequate due diligence and register you as a shareholder as required to comply with our legal and regulatory obligations.	Our legal obligation
Contact information: such as name; email; telephone number; address.	To register you as a shareholder and to contact you with information relevant to you as a shareholder in Metro Mining.	Our legal obligation
Financial due diligence information: such as, criminal conviction data including investigations; allegations or prosecutions relating to financial misconduct.	To undertake adequate financial due diligence to comply with regulatory requirements and to assess any financial misconduct.	Our legal obligation or legitimate interests and compliance with regulatory requirements relating to unlawful acts and dishonesty.
Our People (such as our directors, executive management, employees, future employees and contractor staff (e.g. labour hire, agency or temporary workers, secondees))		
Identification data: such as your name; gender; photograph; date of birth; worker ID.	To verify your identity, negotiate and enter into a contract with you or authorise you to perform work with Metro Mining or at a Metro Mining location.	Our legal obligation
Contact details: such as home and business address; telephone number(s); email addresses; emergency contact details.	To verify your identity, negotiate and enter into a contract with you or authorise you to perform work with Metro Mining or at a Metro Mining location.	Our legal obligation



Data / Information Type	Why do we use this information?	Legal Basis
<p>Employment details: such as job title/position; office location; employment contract; training information; performance and disciplinary records; grievance procedures and business conduct reporting; hours of work; sickness/ leave records; talent management information; details of termination or resignation of employment; details of promotions, transfers, and secondments.</p>	<p>To carry out our contract with you, monitor your work with our policies/ standards/procedures, provide you with training and benefits and provide remuneration.</p>	<p>Our legal obligation</p>
<p>Background information: such as academic/professional qualifications; education, CV/resume; language skills; details of spouses and dependents; references; previous employer details; membership of professional or trade association or trade union.</p>	<p>To undertake adequate due diligence, to enter into and perform a contract with you, to carry out education and training programs, to carry out planning and forecasting activities, to authorise you to perform work with Metro Mining or at a Metro Mining location, and for other international business processes.</p>	<p>Our legal obligation</p>
<p>Employment equity information: such as race and gender (where required).</p>	<p>To comply with statutory reporting obligations under applicable local laws.</p>	<p>Our legal obligation</p>
<p>Vetting information: such as criminal records data including background checks; pre-employment medical information/ results; psychometric testing; drug and alcohol screening and testing results; anti-corruption checks (including information about close relatives); references; qualification checks; data relating to equal opportunities monitoring; health and workers compensation claims; health monitoring results and records.</p>	<p>To undertake adequate due diligence, to enter into and perform a contract with you, to carry out education and training programs, to carry out planning and forecasting activities, to authorise you to perform work with Metro Mining or at a Metro Mining location, and for other international business processes.</p>	
<p>National identifiers: such as national ID/passport; birth certificate; immigration/visa status.</p>	<p>To undertake adequate due diligence, to enter into and perform a contract with you, to carry out education and training programs, to carry out planning and forecasting activities, to authorise you to perform work for Metro Mining or at a Metro Mining location, and for other international business processes.</p>	
<p>Financial information: such as banking details; tax information; withholdings; salary; benefits; expenses; company allowances; stock and equity grants.</p>	<p>To carry out our contract with you and provide you with benefits and remuneration.</p>	
<p>IT information: information required to provide access to company IT systems and networks such as IP addresses, log files, contact information and login information.</p>	<p>To carry out our contract with you, monitor your compliance with our policies, conduct our business operations and manage our IT environments.</p>	



Data / Information Type

Why do we use this information?

Legal Basis

Other information relating to your employment: such as, information relating to internal audits; communications with you (including notes from meetings and telephone calls); feedback or survey responses you provide to us.

To comply with our legal and regulatory obligations and to carry out our contract of employment with you or authorise you to perform work with Metro Mining or at a Metro Mining location.

Other information relating to potential employment: such as, information collected from pre-clearance questionnaires and/or interviews; criminal background checks; passports and visas; equal opportunities monitoring; safety certificates; health information; technical information from using our website (e.g. device type; unique device identification numbers; browser type).

To comply with our legal and regulatory obligations and to carry out our contract of employment with you.

Joint venture partners and other third parties within whom Metro Mining has a business relationship – includes suppliers (of goods and/or services), business partners, JV partners, co-investors.

Contact information: such as, name; email; telephone number; company name; business address; business phone number.

To enter into a business relationship with the third party. To keep you informed about our activities and updates, to respond to any queries and requests, to manage and resolve any commercial or legal complaints or issues, to carry out planning and forecasting activities and for other international business processes.

Third party personnel: such as, name; role/position; citizenship/nationality; national identity numbers; type and percentage of ownership.

To carry out due diligence prior to entering into a relationship with the third party and/or to decide whether to continue a business relationship with the third party.

Financial and compliance due diligence information on relevant personnel: such as, criminal conviction data including investigations, allegations or prosecutions relating to financial or other serious misconduct.

To undertake adequate financial and compliance due diligence to comply with regulatory requirements to assess any financial and compliance misconduct.

Customers and other users of Metro Mining products and services

Contact and payment information: such as, name; email; telephone number; address; payment and bank details (if required)

To enable us to provide our products and services to you, to keep you informed about our activities and updates, to respond to any queries and requests, to carry out market analysis and research, to manage and resolve any commercial or legal complaints or issues.



Technical information: such as device type; unique device identification numbers; browser type; broad geographical location.

To monitor the use of our products and services and to assess, maintain, upgrade, and improve our products and services, to carry out market analysis and research, to carry out planning and forecasting activities and for other internal business processes.

Visitors to our Website

Contact information: such as, name; email; telephone number; address; content of free text query.

To respond to your queries and requests, to provide you with a subscription to our newsletter

Technical information: such as device type; unique device identification numbers; browser type; broad geographical location.

To monitor the use of our website and to assess, maintain, upgrade, and improve our website, to carry out market analysis and research.

Visitors to our physical offices and sites

Identification information: such as, passport or national form of identification; name; contact details; employer information.

To verify your identity, to enable you to enter our offices or sites, and to undertake adequate due diligence.

Information obtained during your visit: such as, CCTV images; car registration information; access records and registration details.

To allow you access to our premises in line with our security policies and procedures and to manage and resolve any legal or commercial complaints or issues, including security incidents.

Other information relating to your visit on-site: such as, results of drug/alcohol testing.

To adhere to and comply with our health and safety practices.