



Privacy Policy

1 Policy

This policy statement outlines how the Company manages the personal information held about employees, suppliers and shareholders. The Company's privacy policy is based on transparency and the Company 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 Company!"

2 Record Keeping

The Company maintains records of:

- Employees, Shareholders, Suppliers and Contractors; and
- Personal information to meet legal requirements.

3 Information Requested

- The nature of the services provided determines the range of personal information we require from our personnel.
- The Company obtains most of the information directly from personnel through registration forms.
- The Company may ask for other information voluntarily from time to time.
- If any information requested by the Company is not provided to address the Company's needs, the Company may decide not to start or continue a relationship with the person or organisation.

4 Information Use and Disclosure

The Company uses the personal information collected to perform its business function, fulfil legal obligations, and ensure personnel safety.

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 Company to report information;
- When required by law; or
- In situations where harm to a person or substantial property is imminent and release of the information might avert such harm.

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It is recognised that the transfer of information collected by or transferred to a third party may occur as part of the normal operations of the Company. This could be:

- The collection and transfer of information by associates involved in logistical management on behalf of the Company;
- The transfer of information to and from a business partner or recruitment agent;
- The provision of information to the Australian Immigration Office or the Foreign Government Immigration Departments with respect to visa processing; or
- Reporting required by legislation.

The transfer of this information would form part of the necessary process for the performance of the contract between suppliers and the Company.

5 Sensitive information

- Some personal information we hold is sensitive. Sensitive information can relate to a person's racial or ethnic origin, remuneration, tax file number, state of health, medical and or employment history.
- The way the Company 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.

6 Information Storage

- Safeguarding the privacy of information is important to the Company, whether interaction takes place personally, by phone, mail, over the internet or other electronic medium. The Company 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 Company 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.

7 Notification of Data Breaches

- The Company 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.

8 Accuracy of Information

- The Company endeavours to ensure that the personal information held is accurate and current. The Company 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 Company can generally update personnel information over the telephone or via e-mail. Employees should ensure that their personal details held by the Company 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 Commonwealth Privacy Act, people have the right to obtain a copy of any personal information which the Company holds about them and to advise the Company of any perceived inaccuracy. The Act does set out some exceptions.
- To make a request, the individual will need to complete an application verifying his/her identity and specifying what information is required.
- The Company 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.

9 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 to provide a visa.

10 Contacting us

If you have any questions or complaints about your privacy, please contact the Company Secretary. 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.

Adopted by the Board on 27 January 2021.