



FIREFINCH LIMITED

PRIVACY POLICY

DATE	ACTION	CHANGE	REVISION
03.11.2017	Adoption of Policy	N/A	-
01.03.2021	Amendments to Policy	General update for legal compliance	

1 INTRODUCTION

Firefinch Limited ABN 11 113 931 105 (**Company**) is an Australian incorporated company and is subject to the *Australian Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) which form part of the Privacy Act.

This Privacy Policy relates to the Company and each of its Australian subsidiaries (**we, us and our**).

2 PURPOSE

This Privacy Policy sets out how we collect, use and disclose personal information entrusted to us by our customers or otherwise collected and used by us.

We may modify or amend this Privacy Policy from time to time. We will display a notice on our website for a period of 30 days indicating when any such revisions have been made.

Unless you notify us otherwise, we will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Privacy Policy.

3 WHAT IS PERSONAL INFORMATION?

- (a) Personal information is information or an opinion about an individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.
 - (b) Sensitive information is subset of personal information and has the meaning given to it in the Privacy Act. Sensitive information means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetic or biometric information. We do not normally collect, hold or use such information, except in relation to our staff as described in section 4 below.
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4 WHAT PERSONAL INFORMATION DO WE COLLECT?

We only collect personal information if it is necessary for one of our functions or activities. The types of personal information we collect will depend on the reason for collection. Generally, the types of personal information we collect will include name, contact details and records of communications with us. In addition, we collect personal information relating to:

- (a) **shareholders**: information about the shareholding, banking details and tax file numbers for payments of dividends and other amounts, through the Company's share registry;
- (b) **staff (employees and contractors)**: the information collected may include birthdates and working conditions; health and workers compensation claims information; banking and tax file number details; and, in some limited cases, voluntarily provided ethnic background information; and
- (c) **job applicants**: employment and academic histories, the names of referees and, in some cases, health information based on testing undertaken by or for us. We will collect this information directly, from organisations that provide recruitment related services to us, and from third parties who provide job applicants with professional or personal references.

We will also collect personal information, including names and contact details, about:

- (a) **our suppliers and contractors**. This information is collected for business-related purposes but contains some limited personal information being contact details for the people that we deal with;

- (b) **people who correspond with us**, including through our website, in which case we may keep a copy of that correspondence and relevant contact details; and
- (c) **people who request information updates about us** through our website mailing list.

When you access and use our website we will record and log for statistical purposes certain information about such access and use, including your IP address, the date and time of your visit, the parts of our website you access during your visit, your actions on our website, and the browser you are using.

As well as collecting information directly from you, there may be occasions when we collect information about you from a third party. For example, we may collect information in relation to shareholders from our share registrar.

5 ANONYMITY

As a general rule, you do not have to provide us with any personal information if you choose not to. However if you do not provide us with your personal information, we may be limited in our interactions with you and our ability to be able to be able to provide services or records (if necessary). There may be circumstances in which we do require personal information to be provided, such as for our staff and shareholders or where we are required by law to ask for personal information.

6 COOKIES

If you use our website, some of the personal information referred to in section 3 may be collected through the use of cookies. Most browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt you whether you wish to accept cookies on a particular site, or by default reject cookies. Please note that rejecting cookies may mean that some or all of the functions on our Website will not be available to you.

7 THE PURPOSES FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

We collect, hold and use personal information to:

- (a) communicate with, and comply with our legal obligations to, our shareholders, and to process payments to them;
- (b) enable third party service providers to provide us and our related companies with services such as information technology, auditing, legal advice, printing and mailing services, and services relating to our share register and any employee incentive plan;
- (c) correspond with people who have contacted us, and deal with feedback;
- (d) provide services to, and manage, our related companies;
- (e) recruit and assess potential staff;
- (f) manage our relationship with existing staff; and
- (g) maintain and update our records.

8 DISCLOSURE OF YOUR PERSONAL INFORMATION

Third parties we may disclose personal information to include:

- (a) our related companies;
- (b) our service providers and professional advisors including IT service providers, auditors, legal advisors, mail houses and our share registrar;
- (c) financial institutions that we use; and

- (d) Government agencies.

We take steps to ensure that our service providers are obliged to protect the privacy and security of personal information and use it only for the purpose for which it is disclosed.

We may disclose personal information we have collected to third parties located overseas in circumstances permitted by the Australian Privacy Principles (APP), including in the Republic of Mali, where the Company's operations are located.

9 HOW WE HOLD PERSONAL INFORMATION

We take security measures to protect your personal information from misuse, interference or loss, and from unauthorised access, modification or disclosure. This includes the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of your personal information.

10 ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

- (a) We will, on request, provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under the APPs.
- (b) If you require access to your personal information, please contact the Company at info@firefinchltd.com. Before we provide you with access to your personal information we will require some proof of identity. For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.
- (c) If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the APPs (unless it would be unreasonable to do so).
- (d) We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

11 CONTACT

If you have any queries or complaints with regard our collection, use or management of your personal information, please contact:

Firefinch Limited,
Level 3, 31 Ventnor Avenue
West Perth, WA 6005

Phone: +61 8 6149 6100

Email: cosec@firefinchltd.com

If you wish to make a complaint about an alleged breach of the Privacy Act, we ask that you send us your complaint in writing to the email address listed above. We endeavour to respond to complaints within a reasonable period (usually 30 days). If you are not satisfied with our response, you may make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at enquiries@oaic.gov.au