



# BELLEVUE GOLD

## Privacy Policy

Revision	Date	Reason for Issue	Prepared by	Reviewed by	Approved by
A	11/10/2021	Initial issue	General Counsel & Joint Company Secretary		General Counsel & Joint Company Secretary

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## 1 PURPOSE

This policy explains how Bellevue Gold Limited ACN 110 439 686 (**we, us, our**) manages Personal Information of individuals that interact with us (**you, your**), which includes representatives of our suppliers, customers, business partners, landowners, industry association representatives, users of our Website, shareholders and job applicants. It details our obligations and your rights in respect of our dealings with your Personal Information.

This policy also describes what happens to your Personal Information that is collected via our Website at and otherwise when we interact with you.

## 2 DEFINITIONS

In this policy:

- (a) **Personal Information** has the meaning given under the Privacy Act but, in short, means information or an opinion relating to an individual that can be used to identify that individual;
- (b) **Privacy Act** means the *Privacy Act 1988* (Cth) including the Australian Privacy Principles (as amended from time to time);
- (c) **Sensitive Information** has the same meaning as under the Privacy Act; and
- (d) **Website** means [www.bellevuegold.com.au](http://www.bellevuegold.com.au).

The meaning of any general language is not restricted by any accompanying example and the words 'includes', 'including', 'such as', 'for example' or similar words are not words of limitation.

## 3 HOW WE COLLECT YOUR PERSONAL INFORMATION

We will collect and store your Personal Information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your Personal Information directly from you, which may include through some of the following means:

- (a) when you make an inquiry through the Website;
- (b) when you contact us via telephone, facsimile or email;
- (c) from correspondence (whether in writing or electronically);
- (d) while conducting market research surveys;
- (e) when you apply for a job with us;
- (f) when you purchase shares in Bellevue Gold Limited;
- (g) when you visit our premises or sites;
- (h) in administering and performing any contracts with service providers, joint venture partners, landowners or other companies we deal with;
- (i) in interacting with industry associations relevant to our business;
- (j) when administering any of our services; and
- (k) as otherwise required to manage our business.

In certain cases we may collect Personal Information from publicly available sources and third parties, such as suppliers, recruitment agencies, regulatory authorities, government agencies, contractors, our

customers and our business partners. If we collect Personal Information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

## **4 TYPES OF PERSONAL INFORMATION WE COLLECT**

The type of Personal Information we may collect may include your name, postal address, email address, phone or fax numbers, billing information, medical details and, if applicable, employment information, as well as any information contained in your communications or interactions with us.

We may also collect and hold Sensitive Information about you if you are a visitor to our premises or sites or a job applicant, which may include:

- (a) health information;
- (b) criminal history;
- (c) membership of trade unions or professional associations; and
- (d) biometric information.

We only collect Sensitive Information about you with your consent, or otherwise in accordance with the Privacy Act.

Where you do not wish to provide us with your Personal Information, we may not be able to provide you with requested goods or services, allow you to access our premises or sites, or otherwise interact with you.

## **5 OUR PURPOSES FOR HANDLING YOUR PERSONAL INFORMATION**

As a general rule, we only process Personal Information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use, and disclose Personal Information:

- (a) to offer and provide our goods and services;
- (b) to manage and administer those goods and services, including account keeping procedures;
- (c) to communicate with you;
- (d) to undertake recruitment processes;
- (e) to ensure and monitor health and safety at our premises and sites;
- (f) to engage with landowners, industry associations and the community;
- (g) to comply with our contractual and other legal and regulatory obligations;
- (h) for insurance purposes; and
- (i) to otherwise to manage our business and records,

and for any related (or in the case of Sensitive Information, directly related) purpose for which it would reasonably be expected to be used or disclosed. We will not use or disclose your Personal Information for any other purpose unless you have consented to that use or disclosure.

We may disclose Personal Information between our organisations or to third parties such as our suppliers, organisations that provide us with technical or support services, government agencies and regulatory authorities, our related entities or potential acquirers of the whole or part of our business or assets, or our

professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

## **6 PROTECTION OF PERSONAL INFORMATION**

We endeavour to keep our information systems and files secured from unauthorised access. We hold Personal Information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of Personal Information. This also applies to disposal of Personal Information.

We further protect Personal Information by restricting access to Personal Information to only those who need access to the Personal Information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your Personal Information.

We will destroy or de-identify Personal Information once it is no longer needed for a valid purpose or required to be kept by law.

## **7 DIRECT MARKETING**

If you consent, we may send (or allow third party partners to send) you marketing communications by SMS, email, post or social media. You may opt out of such marketing communications at any time by contacting our Privacy Officer or using any mechanisms for unsubscribing provided in the communication.

## **8 COOKIES AND THIRD PARTY LINKS**

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We may use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

The Website may contain links to third party websites. We are not responsible for the content or policies, including privacy policies and practices, of such third party websites. You should refer to the privacy policies of such websites.

## **9 ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

You may contact our Privacy Officer to request access to the Personal Information that we hold about you and/or to correct any inaccurate or out of date information, at any time. If there is a reason under the Privacy Act or other law for us not to provide you with information, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the Personal Information about you held by us.

We are not obliged to correct any of your Personal Information if we do not agree that it requires correction and we may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of Personal Information within a reasonable time.

## **10 OVERSEAS TRANSFERS OF PERSONAL INFORMATION**

As at the date of this policy, we are not likely to disclose your Personal Information to overseas recipients.

If in future we do propose to disclose Personal Information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

If you do not want us to disclose your Personal Information to overseas recipients, please let us know.

## **11 RESOLVING PERSONAL INFORMATION CONCERNS**

If you have any questions, concerns or complaints about this policy, or how we handle your Personal Information, please contact our Privacy Officer:

The Privacy Officer  
Ground Floor, 24 Outram St West Perth, WA, 6005  
Telephone: +61 (8) 6373 9000  
Email: [cosec@bellevuegold.com.au](mailto:cosec@bellevuegold.com.au)

We take all complaints seriously and will respond to your complaint within a reasonable period. The Privacy Officer will use reasonable endeavours to resolve the complaint within 30 days after receipt. If you are not satisfied with the resolution offered by the Privacy Officer, you may request that the complaint be referred to our Chief Financial Officer, who will use reasonable endeavours to review the complaint and the resolution offered by the Privacy Officer within 30 days after the complaint is referred to them.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney, NSW, 2001  
Telephone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **12 POLICY REVIEW**

We reserve the right to change the terms of this policy from time to time, without notice to you.

An up to date copy of this policy is available on our Website.