

1. POLICY OVERVIEW

Heathgate Resources Pty Ltd (**Heathgate**) believe privacy is an important right of individuals and is committed to protecting personal information from misuse, and to use personal information only in the ways described in this Privacy Policy, and in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**).

A copy of the Australian Privacy Principles, as contained in the Privacy Act, may be obtained from the website of the Australian Government's Office of the Australian Information Commissioner : [APP | OAIC](#).

This Privacy Policy does not apply to personal information collected, or otherwise obtained, by Heathgate in relation to current and former employees and which relates directly to the employment relationship that exists, or existed, between Heathgate and its current and former employees.

2. PERSONAL INFORMATION

Personal Information means information or an opinion about an individual whose identity is apparent, or an individual who is reasonably identifiable from the information or opinion; for example name, address, gender, email address, telephone number, date of birth, qualifications, etc. For potential new employees and individuals entering our work sites, this may also include diversity information, employment history, medical history, transactional information (such as bank account), security and travel information (visa details) and digital images.

3. ANONYMITY & PSEUDONYMITY

In most circumstances, it is impracticable for individuals to communicate with Heathgate anonymously, assistance is limited without individual's identification. However, in circumstances where it is lawful and practicable to do so, Heathgate will allow an individual to use a pseudonym for the purpose of communications.

4. COLLECTION OF PERSONAL INFORMATION

Personal Information is collected in various ways when individuals engage with Heathgate in relation to business operations, service provision, when applying for employment or when requesting site entry.

Heathgate also collects Personal Information from a range of individuals in the course of business operations from employees of subcontractors, suppliers, service providers and visitors to site.

If personal information is not provided, it may affect our ability to reasonably do business with an individual or if the individual is an applicant for employment or a contractor, we may not be able to process the application for a position or engagement with Heathgate. By providing Heathgate with Personal Information, the individual authorises the personal information being collected, held, used and disclosed in accordance with this Policy.

It is important that Personal Information is up to date. Heathgate will take reasonable steps to ensure that personal information is accurate and up to date. Individuals should advise us of any changes in personal information.

5. USE OF PERSONAL INFORMATION

Heathgate may collect, store (in hard copy or electronic form) and use personal information primarily for the purpose of conducting and supporting Heathgate's business activities. Examples of the use of Personal Information includes:

- Identity verification and communication
- For the assessment of suitability for an employment opportunity.
- In order to contact individuals
- Receiving goods and services, and supporting procurement processes

6. DISCLOSURE OF PERSONAL INFORMATION TO A THIRD PARTY

Personal Information may be disclosed where we are required or authorised by law, and where third parties are appointed by Heathgate as part of our business operations, including:

- Professional advisors: auditors, insurers, lawyers
- Information technology service providers
- Marketing and advertising contractors
- Operational and maintenance contractors

When third parties act on behalf of Heathgate, they are asked to handle Personal Information in accordance with the Privacy Act and other relevant privacy laws.

Heathgate will not use or disclose personal information for a secondary purpose unless written consent is received from the individual, the disclosure is required by law or otherwise permitted by the Privacy Act (for example, as a necessary part of an investigation of suspected unlawful activity).

7. SECURITY AND DISPOSAL OF PERSONAL INFORMATION

Personal Information will be stored in a manner that reasonably protects it from misuse, interference and loss from unauthorised access, modification or disclosure.

No data transmission over the internet can be guaranteed to be 100% secure. As a result, while Heathgate will endeavour to protect personal information, it cannot ensure the security of any information transmitted to us via electronic means, and individuals do so at their own risk. Once personal information is received by Heathgate, every reasonable effort is made to ensure its security on Heathgate's Information Systems.

Reasonable steps are taken to destroy or de-identify personal information in a secure manner when there is no further need for it or if required to do so by law.

Personal Information will be retained for as long as it is required to fulfil the purpose for which it was collected, unless a longer retention period is required for the purpose of discharging legal, accounting and reporting requirements.

8. ACCESS TO PERSONAL INFORMATION

Subject to any exceptions in the Privacy Act, Heathgate will make available for inspection the personal information, based on the information supplied by the individual, that it holds in relation to an individual, provided reasonable notice is given. Heathgate will endeavour to process any request for access within 30 days of the request. Some requests however may take longer depending on the nature of the personal information requested.

If the request to access Personal Information is complex or if Heathgate are likely to incur additional costs in providing the access, a reasonable fee may be charged for preparing the information. Such charge will be advised in advance so the individual can decide whether they wish to proceed.

If Heathgate refuse to give access to Personal Information, the reason(s) for refusal will be provided.

9. CORRECTION OF PERSONAL INFORMATION

Heathgate take reasonable steps to ensure that Personal Information that is collected is correct, complete and relevant for the purposes for which we collect it. It is however reliant on the accuracy and frequency of data provided by the individual, therefore Heathgate should be notified of changes to personal information.

10. CHANGES TO PRIVACY POLICY

This Policy will be reviewed and updated every three years unless required sooner due to changes in legislation. A copy will be available on both the Heathgate website (www.heathgate.com.au) and Heathgate's internal intranet "U-Connect".

11. POLICY APPROVAL



Joe De Gennaro

President

1 February 2026