

PALADIN ENERGY LTD

ACN 061 681 098



PRIVACY POLICY

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1. INTRODUCTION

Paladin Energy Ltd (Paladin or the Company) has a firm commitment to protecting the privacy of any personal information that we collect and hold.

Paladin is bound by the Australian Privacy Principles under the Privacy Act 1988 (as amended or superseded) and other applicable Commonwealth and State laws which protect your privacy.

This policy covers all personal information that we hold.

2. TYPES OF PERSONAL INFORMATION COLLECTED

The Company will only collect personal information if it is necessary to its business activities. Situations in which Paladin may collect personal information include:

- Employment and recruitment purposes.
- Legal requirements (State and Federal).
- When dealing with certain Government agencies.

- Safety administration.
- Company website mailing list.

Whenever Paladin collects personal information from you, it will do so in a fair and lawful manner. Paladin will also notify you at the time of collection or as soon as reasonably practicable of the purpose/s for which the collected information will be used, and how and where you are able to contact us, should you have any queries.

Paladin will also advise you of the third parties to whom the Company usually discloses such information and that you are able to gain access to that personal information that has been collected.

If you do not wish to provide the information requested, Paladin will tell you what impact this will have.

3. HOW PERSONAL INFORMATION IS COLLECTED

Personal information is collected in person, in writing, by telephone, by email and through other various methods of communication. Most of the personal information Paladin collects is information that has been provided to us by the individual.

We may also receive unsolicited personal information. In these circumstances we will determine whether, if we had collected the information, we would have been permitted to do so under the Act. If we could not have collected this information, provided that it is not a Commonwealth record, we either destroy the information or ensure that it is de-identified.

In some circumstances, Paladin may be provided with personal information about an individual from a third party. Third parties may include:

- Medical and health professionals.
- Nominated referees.
- Recruitment providers.

If we collect the information from a third party we will take reasonable steps to promptly notify you of that collection and the circumstances surrounding the collection. Information collected from third parties will be dealt with in accordance with the Australian Privacy Principles.

4. USE OF PERSONAL INFORMATION

The Company uses personal information to select suitable staff, to facilitate the administration of staff and their records, to contact next-of-kin (only when necessary), to retain and manage staff throughout the term of engagement, to assist in safety management, performance management and career development and to comply with statutory obligations.

5. DISCLOSING PERSONAL INFORMATION

The Company will only disclose personal information in accordance with the Act. This means that it will only disclose information to a third party if:

- Paladin told you when collecting it that it would be disclosed for that purpose, or for a related purpose that you would reasonably expect;
- you have given your written consent;
- Paladin are required by law to disclose it; or
- it is otherwise permitted under the Act.

Third parties that Paladin may disclose personal information to include:

- Nominated referees.
- Health professionals.
- Insurers.
- Superannuation fund administrators.
- Suppliers of human resources related services to the Company.
- Government agencies.
- Other service providers nominated by yourself.

The company will not disclose personal information for the purpose of direct marketing, unless one of the exceptions under the Act apply.

If circumstances arise where we disclose personal information to an overseas recipient, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION OVERSEAS

With operations in overseas territories (including Namibia, Malawi, South Africa, Niger, Canada, United States and United Kingdom), Paladin may disclose your personal information to third parties located outside of Australia, if it is reasonably necessary for Paladin's business. Paladin may only disclose your personal information to third parties in a foreign country if such disclosure is permitted by the Australian Privacy Principles. This includes:

- if we are authorised to do so by law;
- when we use or disclose your personal information for any permitted purpose set out in this Policy; or

- if you have consented to us doing so.

Paladin will, if and to the extent required by the Privacy Act, take reasonable steps to ensure that any overseas recipient complies with the Australian Privacy Principles in relation to your personal information, unless we have a reasonable belief that the overseas recipient is subject to a law or binding scheme which is at least substantially similar to the Australian Privacy Principles and that you have mechanisms to take action to enforce any misuse of your personal information in that location. By providing Paladin with personal information, you consent to Paladin disclosing personal information to an overseas recipient.

7. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

Access to an individual's personal information is restricted and the Company staff are required to respect the confidentiality of personal information and the privacy of the individual.

Paladin has in place steps to protect the personal information it holds from misuse, interference, loss, unauthorised access, modification or disclosure, by use of various methods including password access to computerised records and lock storage of paper records.

Any personal information collected by the Company on employees is required by the Statue of Limitation to be held for a minimum of seven (7) years.

Personal information collected on persons other than employees is appropriately destroyed or permanently de-identified once it is no longer required.

8. QUALITY INFORMATION

The Company will take all reasonable steps to ensure that the information that it collects, uses and discloses is accurate, complete and up to date.

If you believe there is a discrepancy in your personal information held by us, or if any information changes, please notify the Company Secretary and we will endeavor to update and correct the information held in our records.

9. ACCESS TO YOUR PERSONAL INFORMATION

You can access any personal information Paladin has collected about you upon request. However, there are occasions when this access may be denied under the exemptions contained in the Act.

Circumstances in which Paladin may refuse access could include where:

- Providing the information would have an unreasonable impact on the privacy of others.
- The information relates to legal proceedings.

- providing the information would pose a serious threat to the life, health or safety of any individual.
- Providing access would be unlawful.
- the request is frivolous or vexatious
- Providing access would prejudice certain investigation and enforcement related activities as defined by the Australian Privacy Principles-12.3(h)-(j).
- Providing access would reveal the intentions of the organisation in relation to negotiations.
- Denying access is required or authorised by or under law.

Requests for access to your personal information should be directed to the Group Company Secretary, based in the Perth head office. A response will be provided within a reasonable period after the request has been made. Where you are refused access, a written notice outlining the reasons for the refusal and the mechanisms to complain about the refusal.

10. BREACHES

In the case of a data breach, any individuals affected by a data breach that is likely to result in serious harm will be notified with recommendations on the actions affected individuals should take in response to the breach.

11. PRIVACY INQUIRIES

If you have any questions about this privacy policy, any privacy related dealings with Paladin or a possible breach of your privacy, or would like any further information, please contact the Group Company Secretary, based in the Perth head office.

12. REVIEW

This policy will be reviewed regularly and updated as required.

Date adopted: 18 August 2005

Last amendment: 13 May 2015

Last review: 20 August 2019