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# DATA PROTECTION AND PRIVACY POLICY

September 2023

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## 1. Introduction

Protecting your data and privacy is very important to us. This policy sets out how the Sovereign Metals Limited (**Sovereign** or **Company**) group collects and processes your personal information. It also sets out your rights in relation to the personal information we may hold about you. If you have questions about this policy, please contact the Company Secretary at [info@sovereignmetals.com.au](mailto:info@sovereignmetals.com.au)

What does this policy do?

This policy describes how Sovereign deals with personal information of individuals that interact with Sovereign – this includes representatives of our suppliers, stakeholders, business partners; landowners; industry association representatives; users of the Sovereign website; shareholders; and job applicants.

For the purposes of this policy, "personal information" means any information about an identified or identifiable person. This includes where you can be identified, directly or indirectly, including by reference to an identifier (for example, a name or email address, or an online identifier such as a unique identification number). We use the words "process" and "processing" to describe the various things we may do with your personal information – including using, disclosing, holding, recording, storing, transferring or otherwise handling that information.

## 2. Types of personal information we collect

We may collect and process different types of personal information depending on how you interact with us. In some cases, this may include information that shows who you are and/or is linked to you as a result of your interactions with Sovereign. In some circumstances, we may also collect sensitive personal information about you.

### How we collect personal information

We will primarily collect personal information from you either directly (such as when you subscribe to a news alert or request information from us, including through the Contact Us form available on our website) or indirectly from your interactions with us (such as by monitoring your use of the Sovereign website). In some cases, we may also collect personal information about you from third parties (such as recruitment agencies).

### Types of personal information we collect

The types of personal information that we collect about you may include:

- Identification data – such as your name, job title and date of birth.
- Contact details – such as your home and business address, email address and telephone number.
- Recruitment-related information – such as your name, email address, location, telephone number, qualifications, employment history, interests, types of roles you are interested in, your work application form and resume. If you progress through the interview process, we may also collect interview notes, references, results of any background checks (including criminal or police checks, if any), your work visa and other information to verify your identity and right to work.
- Usage information – information we collect when you use our website, such as server log information (your IP address, browser type, operating system, browser language, time zone, access times and any referring addresses) and location information.
- Other information – this includes other information you voluntarily provide to Sovereign.

### Sensitive Personal Information

Some types of personal information are considered to be more private than others (which, depending on jurisdiction, includes information about someone's racial or ethnic origin, political opinions, religious beliefs or affiliations, health or medical conditions, genetic information, biometric information, sexual orientation, criminal record, trade-union membership and political association membership). This type of information is called "sensitive personal information".

Sometimes we may collect sensitive personal information about you (such as health or medical information, criminal history or police checks, or your racial or ethnic origin), but we will only do this as described in section 3 (Why we process your personal information) below.

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### 3. Why we process your personal information

We process personal information to conduct our business – this includes managing our contractual relationships, recruitment, monitoring access to our website, managing safety and security risks, and complying with our legal obligations. We also process sensitive personal information where you have provided your consent or it is necessary to comply with legal obligations.

The purposes for which we process your personal information will depend on the type of personal information collected and the context in which it was collected. However, the primary purposes for which we process personal information include:

- managing our relationship with you – this includes providing you with information and communicating with you;
- business-related purposes – this includes negotiating, managing, and fulfilling our contracts with suppliers and third parties; managing business relationships; administering real estate items (including relocation); conducting clearance procedures; managing accounts and records; supporting corporate social responsibility activities; resource planning and workforce management; activities and operations; and internal investigations;;
- marketing and public relation purposes – this includes analysing the characteristics of visitors to our website; to prepare analytics and profiling for business intelligence purposes; managing our communications and, where Sovereign collects details in the membership database relevant to Sovereign's website and web and email boardcast, for demographic analysis and personalisation of the website.
- recruitment-related purposes – this includes considering you for career opportunities (including internship positions) with Sovereign and inviting you to participate in recruitment activities and events;
- managing safety and security risks – this includes managing and monitoring access and use of our premises and sites, safety and security at our sites (including through the use of CCTV), and our IT environment (including monitoring electronic communications) and the health of those on our sites;
- website administration and internal operations – this includes troubleshooting, data analysis, testing, research, statistical and survey purposes;
- managing shareholder relationships – this includes for the purposes of undertaking share transactions, dividend payments (if any) and communications with shareholders (e.g. Annual General Meetings, etc); and
- legal obligations – this includes meeting obligations imposed under law; responding to lawful requests from governments, public authorities and regulators; and responding to potential or actual litigation (if any).
- We may also collect and process your personal information for any other purposes for which you have provided your consent or if there is another lawful basis for doing so.

If we do not collect your personal information, it may affect our ability to perform these functions.

#### **Sensitive personal information**

As flagged above, sometimes we may need to collect and process sensitive personal information about you, but we will only do this:

- where you have explicitly provided your consent; or
- where otherwise permitted by applicable laws and regulations.

#### **Cookies**

Our website may use cookies. Cookies are small pieces of data stored on the web browser of your device. These may be used by us for site administration and analysis purposes. If you wish not to take advantage of cookies, you may configure your browser not to accept them (although this may disable or render unusable some of the features of our website and/or social media).

#### **Hyperlinks**

Our website may contain links to other websites. We are not responsible for the privacy practices or the content of other websites. The privacy practices applicable to other websites may differ substantially from ours. Please read the privacy policy of any other websites you visit before using such websites.

### 4. Who we share your personal information with

We may share your personal information within the Sovereign Group as well as with third parties involved in the running of our business and your authorised representatives. This may involve sharing information across national borders.

#### **Disclosures within our corporate group**

We may share your personal information (which may sometimes include sensitive personal information) within our corporate group who require the information for the purposes in this policy. This will include sharing your personal information with Sovereign entities in countries other than where the information was originally collected.

An overview of Sovereign's corporate group and the countries in which Sovereign entities operate can be found in Sovereign's



Annual Report. Some members of our corporate group also perform shared services for other Sovereign entities.

#### **Disclosures outside our corporate group**

We may also need to share your personal information (which may sometimes include sensitive personal information) with:

- people you have authorised to interact with us on your behalf (such as recruitment agencies);
- third parties who provide services we use to run our business (such as external service providers that assist Sovereign to perform human relations, information technology and other shared services functions, that provide IT services or that provide security for Sovereign sites or systems);
- prospective purchasers (if any) of all or part of our business or of any shares in Sovereign entity;
- our professional advisors (such as our lawyers and accountants); and
- government authorities, regulators or other persons where obliged to do so by an applicable law.

If we need to disclose personal information to third parties in a different country to where the information was collected, we will take steps to ensure that there is a lawful basis for the disclosure and that the disclosure complies with all applicable laws. This may include entering into a legally binding contract or non-disclosure agreement with the recipient under which they are obliged to handle your information in accordance with applicable laws.

## **5. How we store and protect your personal information**

We take steps to ensure that your personal information is kept secure and protected against unauthorised access or use. We only keep your personal information for as long as we need it to carry out the purposes described in this policy.

#### **Information security**

We have put in place procedures and technologies to maintain the security of your personal information from the point of collection to the point of destruction.

We also take steps to ensure that all our workers are aware of, and are properly trained through applicable information security policies and procedures that are designed to keep your personal information secure. We will investigate and take appropriate action if we become aware of any failure to comply with these policies and procedures.

#### **Storing personal information**

We generally store the personal information that we collect in electronic databases. These databases are generally hosted in Australia (Perth), United Kingdom (London) and Malawi (Lilongwe).

We may also use third parties to store and process your personal information. However, we will only do this if the party agrees to comply with our procedures and policies or if they put in place equivalent security measures.

#### **Information retention**

Our aim is to keep personal information for no longer than is necessary for the purposes described in this policy or as otherwise required by law.

#### **Job applicants**

If you are a job applicant, and your application is unsuccessful, we may retain your personal information for 12 months for the purposes of considering you for other roles within Sovereign. We are under no obligation to retain your personal information for this purpose and may elect to delete your personal information at any time following an unsuccessful application.

## **6. Your rights and choices**

You have rights relating to your personal information held by Sovereign. Let us know if you want to correct your personal information or if you have concerns about how we are handling your personal information.

#### **Your rights**

You have certain rights in relation to your personal information that we hold about you, though the details of these may vary depending on the country where you are based. We respond to all requests we receive from individuals wishing to exercise their rights in relation to any information we hold in accordance with applicable data protection laws.

If you wish to access, correct or update any personal information that we hold about you, please send a request to



[info@sovereignmetals.com.au](mailto:info@sovereignmetals.com.au) or via the 'Contact Us' form available on our website.

It is important to us that all of the information we hold about you is correct and up-to-date, so let us know promptly if there are any errors or other changes should be made.

## 7. Country-specific rules

Additional privacy rules and restrictions relating to our management of your personal information may apply in some countries where we operate (including the United Kingdom).

### *United Kingdom*

The additional provisions in this section apply to all individuals that work for Sovereign and are based in the UK.

### *Interpretation*

For the purposes of all applicable UK, references in this notice to 'personal information' shall be read as references to 'personal data' and Sovereign is the "controller" in relation to your personal information.

### *Legal bases for processing your personal information*

Sovereign will only process your personal information where we have a legal basis for doing so. This means we will process your personal information:

- where necessary in connection with the entry into or performance of a contract between you and us;
- to comply with our legal obligations;
- where it is in Sovereign's legitimate business interests; or
- where you are given a genuine choice as to whether or not we collect your data and you have given us your consent. Where you have consented, you will always have the option to withdraw this consent at a later stage and you will never suffer any detriment if you choose not to consent.

### *Your Rights*

In addition to the rights set out above, you have the right, in certain circumstances, to request:

- the erasure of any personal information that we hold about you;
  - the restriction of processing of any personal information that we hold about you; and
  - the transfer of your personal information from Sovereign to a third party.
- You also have the right to object to the processing of your personal information by Sovereign in certain circumstances.

## 8. Updates to this policy

We will update this policy from time to time where necessary to reflect changes in applicable laws or in our privacy compliance practices. The latest version of this policy will be available online through the Sovereign website.

## 9. How you can contact us

If you have any questions about this policy, contact our us at [info@sovereignmetals.com.au](mailto:info@sovereignmetals.com.au) or +61 8 9322 6322.