



Spartan Resources Ltd Group (Group)

Privacy Policy

Introduction

This policy applies to all Directors, Executives and other employees of Spartan Resources Limited (Company) and all its subsidiaries (Group), and individuals engaging with the Group, accessing its services or facilities or providing goods or services. This policy does not apply to personal information held about current or former employees of the Group.

The Group is bound by the Privacy Act 1988 (Cth)(the Act) and the Australian Privacy Principles that are contained in the Act which make provision to protect the privacy of individuals.

Objectives

The Group respects the privacy of individuals and is committed to ensuring that individuals' personal information is collected, handled and protected appropriately.

The objectives of this policy are to set out the principles that the Group will follow when collecting, using, holding, disclosing and managing personal information.

What is Personal Information?

This is information which identifies an individual or from which an individual's identity can be reasonably ascertained (regardless of the form of the information, and regardless of whether it is true or not). Personal information may also include "sensitive information" which includes information or an opinion about an individual's racial or ethnic origin, health information, political opinions, philosophical or religious beliefs or affiliations, membership of a political or professional association or trade union, sexual orientation or practices or criminal record.

Collection of Personal Information

The type of personal information collected and held, how that information is collected and held and the purposes for which the information will be collected, used, and held will vary and will depend on the circumstances.

The Group may collect personal information about an individual in a variety of ways. Examples of where personal information may be collected by the Group include:

- Collecting personal information from shareholders;
- Collecting information from individuals who enter into service agreements, joint venture agreements or other transactions with the Group;
- Collecting information in relation to employment opportunities provided by the Group;
- Collecting information from visitors to our physical locations (such as our offices, facilities or sites); and
- Collecting information electronically when individuals access Spartan Resources website, or in response to a request for the provision of information.

The Group will only collect personal information about an individual where the information is reasonably necessary for one or more of its functions or activities, and will only collect sensitive information where the individual also consents to the sensitive information being collected.

The Group will only collect personal information about an individual from that individual, unless it is unreasonable or impractical to do so.

Examples of the kinds of personal information the Group may collect and hold include:

- Name;
- Address;
- Email address;
- Date of birth;
- Phone number;
- Fax number;
- Tax file number;
- Bank account and other financial information;
- Health information;
- Information about goods or services ordered, supplied or acquired;
- Information about enquiries made; and
- Communications between an individual and the Group.

The Group will before or at the time of collection of the personal information, or if this is not practicable, as soon as is practicable after collection of the personal information, take reasonable steps to ensure that the individual is aware of the matters required by the Australian Privacy Principles including:

- Why the personal information is being collected;
- Whether the collection is required or authorised by law;
- Who else the personal information may be given to;
- That this policy contains information about how they are able to access and correct the personal information collected; and
- How to and the contact details for the Group, including to make a complaint.

If the Group collects personal information about an individual from someone other than the individual, the Group will take reasonable steps to ensure that the individual is aware that the Group has collected the information, and of the matters required by the Australian Privacy Principles, as detailed above.

The Group will take reasonable steps to ensure that personal information that is collected, used or disclosed by it is complete, accurate, relevant and up to date.

The Group may hold this information electronically or as paper records which may be stored at the Group's premises or by a third party data storage provider.

Use and Disclosure of Personal Information

The Group will only use or disclose personal information for:

- The purpose for which it was collected;
- Any related purpose for which it would reasonably be expected to be used or disclosed;
- A purpose required or permitted by law; or
- A purpose for which the individual has provided consent.

From time to time the Group may need to disclose personal information about individuals to third parties. This may include related bodies corporate, joint venture partners, contractors or agents, government agencies or regulatory bodies, service providers and professional advisers.

The Group requires its service providers and professionals to keep the personal information confidential and not to use it for any other purpose than performing the required services.

It is unlikely that the Group will disclose personal information to overseas recipients.

Security of Personal Information

The Group will take reasonable steps to ensure that the personal information that it holds is protected from misuse, interference, loss and from unauthorised access, modification and disclosure.

Accessing, Updating and Correcting Personal Information

The Group will take reasonable steps to ensure that personal information it holds that is no longer needed for the disclosed purpose is destroyed or permanently de-identified, subject to any legal or statutory requirements to keep the personal information or associated records for any required period of time.

At the request of an individual, the Group will, (in most circumstances), provide access to any personal information that is being held about that individual. There are certain circumstances, in accordance with the Privacy Act, where the Group will not provide an individual access to such personal information. This may include where providing access would reveal commercially sensitive information about the Group, or where providing such access would be unlawful.

An individual can request access to their personal information held by the Group, or request that it be updated by contacting the Group's Privacy Officer.

Queries and Complaints

If an individual has any questions or concerns about the Group's Privacy Policy or wish to make a complaint about any personal information the Group has collected, used, or disclosed, or a breach of the Australian Privacy Principles they should contact the Privacy Officer.

Formal complaints must be made in writing and will be considered promptly and the individual contacted to resolve the matter. If a response has not been provided within a reasonable time or the individual's concern is not resolved to their satisfaction, they are entitled under the Privacy Act to make a complaint to the Office of the Australian Information Commissioner.

Privacy Officer

The Privacy Officer
Spartan Resources Limited
Level 1
41-47 Colin Street
West Perth WA

Email: privacy@Spartanresources.com.au
Phone: + 61 8 9481 3434

Office of the Australian Information Commissioner

The Compliance Officer
Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Email: enquiries@oaic.gov.au
Phone: 1300 363 992
Website: www.oaic.gov.au

Review

To ensure that our policy remains current the Board will review this policy at least annually and update it as required. The Privacy Policy will be posted on Spartan Resources website. A copy of our Privacy Policy will be provided upon request.