# **Privacy Policy**

# 1. Privacy Policy

Caspin Resources Limited ACN 641 813 587 and its related entities (**Caspin, us, we, our**) are committed to protecting the privacy of your personal information in accordance with the *Privacy Act* 1988 (Cth) (**Privacy Act**) including the Australian Privacy Principles (**APPs**).

This policy is intended to provide a general overview of our policies for the handling of your personal information. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances.

"Personal information" is essentially information or an opinion about you as an identified (or reasonably identifiable) individual. "Sensitive information" is a sub-set of personal information that includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, health information and biometric information.

By using our website at www.caspin.com.au (**Website**) and/or providing your personal information to us you consent to us handling your personal information in accordance with the Privacy Policy.

# 2. Collection of your personal information

We may collect personal information about you in the course of your dealings with us as a minerals exploration company.

We may collect personal information as part of our operations, including personal information about our investors, shareholders, prospective and current employees, contractors and other individuals involved in transactions related to our business activities. We may also collect personal information from you in connection with other dealings you may have with us, such as if you make a general enquiry with us, sign up to our news releases or apply for a position with Caspin. The type of information we collect will depend on your dealings with us. Generally, we will collect your name, contact details (including address, telephone number, fax number and email address), business details (ABN, business name and your position within the company – if applicable), information about your communications with us, and about services or goods ordered, acquired or supplied.

We may also collect other personal and sensitive information from you (for example, if you are applying for a position with Caspin then the personal information we collect may include your resume, qualifications, skills, education provider and history, work history and residency status).

We generally only collect information that is necessary for our business functions. We generally collect your personal information directly from you, unless it is impracticable or unreasonable to do so. From time to time, we may collect personal information about you from third parties (for example, from publicly available sources, our agents, our clients or contractors, and as otherwise permitted or required by law).

If you provide us with personal information about a third party, you represent, and we collect it on the basis that, you have that person's consent for us to collect and handle their personal information in accordance with this Privacy Policy.

If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide our products or services to you.

# 3. Purposes for which personal information is collected, held, used and disclosed

We generally use and disclose your personal information for the purposes for which we collected it, for other related purposes that you would reasonably expect, for other purposes required or permitted by law, or for other purposes with your consent.

Generally, the purposes for which we collect it or which you would reasonably expect include responding to your enquiries, providing you with our services and goods, providing you with information about our operations, activities and initiatives, obtaining your feedback, and our general business operations. Our general business operations may include, for example, maintenance of our business records, compliance with our legal and insurance obligations, for performance reporting, research and planning and statistical purposes.

By providing us with your personal information, you agree that we may send you marketing and promotional communications by post or by electronic means (including e-mail and SMS). You can opt-out of marketing and promotional communications at any time using an opt-out mechanism in one of our communications, or by contacting Caspin via the details shown below.

We may exchange your personal information with our related entities, joint venture partners, government agencies or regulatory authorities, our suppliers, service providers, professional advisers and agents for the purposes described above. We may also disclose your personal information to a buyer or prospective buyer of any of our assets or business (or any part of it).

Where appropriate, we may collect, use, disclose and otherwise handle personal information relying on exemptions that may be available under applicable privacy laws including, for example, the employee records exemption in the Privacy Act and provisions in the Privacy Act concerning the sharing of personal information among related bodies corporate.

#### 4. Sensitive Information

We generally only collect 'sensitive information' with your consent. We will assume that you have consented to us collecting all information that is provided to us by you for use in accordance with this Privacy Policy, including any 'sensitive information', unless you tell us otherwise at the time you provide it to us.

#### 5. Storage and security of your personal information

We may hold your personal information in electronic formats or in hard copy. We generally take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss.

We generally take reasonable steps to destroy or permanently deidentify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our Website. Please bear this in mind when transmitting information by this means to us

#### 6. Access and correction of your personal information

You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, in which case please contact our Privacy Officer via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances where the law permits us to deny access. Any such requests must be made in writing to Caspin via the details shown below. No fee will be incurred for requesting access, but if your request for access is accepted we will inform you of the fee (if any) that will be payable for providing access if you proceed with your request.

# 7. Caspin website

Our website at www.caspin.com.au uses cookies such as Google Analytics. We do not use the information stored in those cookies to collect information about you or your computer. The cookies are used for statistical purposes and to assist with your use of the website. We may also collect click-stream data when you use the website, such as the date and time of your visit, the pages you accessed, your IP address, the type of browser and operating system you are using and the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our website is used and navigated and to improve our website.

You can opt out of Google Analytics using the Ads Preferences Manager or Google Analytics opt out browser add-on. For further information about Google Analytics, please refer to the following link: <u>https://support.google.com/analytics/answer/6004245?hl=en</u>.

Our Website may contain links to third party websites. We are not responsible for the privacy, security or handling of your personal information via those websites. You should review the privacy policy and terms of use for those websites each time you visit them.

#### 8. Overseas disclosure of your personal information

Generally we will not disclose your personal information to overseas recipients, except with your consent or where we are required or authorised to do so by law.

#### 9. Changes to our Privacy Policy

We may amend, modify or replace this Privacy Policy at any time. You should review our Privacy Policy each time you visit our website or provide us with personal information.

#### 10. Complaints

If you have a complaint about the way in which we handle your personal information please contact us on the details below. We will confirm receipt of your complaint and set out the time frame we require to investigate your complaint and provide you with a response, which generally, will be within 14 days of receiving your complaint.

#### 11. Contact us

If you would like further information about the way we manage your personal information or if you have a complaint, please contact us via the details below,

Attention: The Privacy Officer Caspin Resources Limited PO Box 558, West Perth WA 6872 Australia

Email: privacy@caspin.com.au Telephone: +61 (8) 9322 7600