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## PRODIGY GOLD NL – PRIVACY POLICY

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### 1. INTRODUCTION

Prodigy Gold NL and its wholly owned subsidiary (“**Prodigy Gold**”) are bound by the Australian Privacy Principles (“**APP**” or “**Principles**”) as contained in the Privacy Act 1988 (Commonwealth). Prodigy Gold's Privacy Policy sets out the principles that Prodigy Gold will follow when collecting, using, holding, disclosing and otherwise managing Personal Information. Prodigy Gold is committed to protecting the privacy of individuals' Personal Information.

"Personal Information" is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not and whether the information or opinion is recorded in a material form or not.

This Privacy Policy applies to all Directors and employees of Prodigy Gold and any other individual that Prodigy Gold may collect Personal Information from.

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### 2. PERSONAL INFORMATION COLLECTION

The type of Personal Information Prodigy Gold may collect and hold may include names, addresses, contact details, information from enquiries made, communications between Prodigy Gold and an individual, occupations and any other information required to meet contractual obligations and statutory obligations.

Prodigy Gold may collect Personal Information in a variety of ways, including by way of personal contact such as business activities and events, mail, telephone, email and internet, for example when an individual accesses Prodigy Gold's website. In some circumstances Prodigy Gold may be provided Personal Information about an individual from a third party.

Personal Information about an individual will only be collected by Prodigy Gold where the information is reasonably necessary for one or more of Prodigy Gold's functions or activities. It will depend on the circumstances and the purposes for which the information will be collected on what kind of Personal Information Prodigy Gold collects and holds and how that information is collected and held.

We may collect Personal Information about individuals, Shareholders, suppliers, employees, other stakeholders and other people who come into contact in the ordinary course of business.

Examples for the purpose of collection of Personal Information include:

- Shareholder information for the purpose of proper records keeping and for reporting; and
- Information about individuals who enter into service agreements, joint venture agreements or other transactions with Prodigy Gold for the administration of those agreements or transactions or for reporting purposes.

Prodigy Gold will only use Personal Information for the purpose for which it was provided. Prodigy Gold will not disclose Personal Information to third parties, unless consent is given or in other circumstances where such disclosure is required or authorised by law.

Prodigy Gold will take reasonable steps to ensure that the Personal Information that is collected, used or disclosed by it is complete and up to date and only collect Personal Information about an individual from that individual unless it is unreasonable or impractical to do so.

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### 3. TRANSFER OF PERSONAL INFORMATION OVERSEAS

Prodigy Gold only transfers information about an individual to someone who is in a foreign country if the individual consents to the transfer or otherwise in compliance with the APPs. Prodigy Gold does not generally disclose Personal Information to overseas parties.

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### 4. USE AND DISCLOSURE OF PERSONAL INFORMATION

Prodigy Gold will take reasonable steps to ensure that the individual is aware of the matters required by the APPs, at or before, or if that is not practicable, as soon as practicable after, the time that the Personal Information is collected, including:

- why the Personal Information is being collected;

- who else the Personal Information might be given to;
- the fact that this Privacy Policy contains information about how the individual is able to gain access to and correction of the information collected; and
- how to contact Prodigy Gold, including making a complaint.

If Prodigy Gold collects an individual's Personal Information from someone else, Prodigy Gold will take reasonable steps to ensure that the individual is aware of the above matters and that Prodigy Gold has collected the information.

This Personal Information will only be used or disclosed by Prodigy Gold 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.

Prodigy Gold may disclose Personal Information about individuals to third parties for example to providers of services to Prodigy Gold, government agencies, regulatory authorities, related bodies corporate of Prodigy Gold and professional advisers of Prodigy Gold. Prodigy Gold's service providers are required to keep the Personal Information confidential and not use it for any purpose other than performing those services.

Prodigy Gold will take reasonable steps to advise employees if the provision of Personal Information required by legislation or other mandatory disclosure may have a non-positive impact.

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## **5. SECURITY OF PERSONAL INFORMATION**

Prodigy Gold will take reasonable steps ensuring that the Personal Information it holds is protected from interference, misuse and loss and from unauthorised access, modification and disclosure.

Subject to any legal obligation to keep the Personal Information for any required period of time, Prodigy Gold will take reasonable steps to ensure that Personal Information it holds and is no longer necessary for the disclosed purpose is destroyed or permanently de-identified.

Prodigy Gold will take reasonable steps to advise employees if the provision of Personal Information is required by legislation or other mandatory disclosure, but has an elevated risk of unintended disclosure.

As far as permissible under the law, Prodigy Gold accepts no responsibility for unauthorised access to Personal Information held by Prodigy Gold.

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## **6. UPDATING, CORRECTION AND ACCESS TO PERSONAL INFORMATION**

Prodigy Gold will in most circumstances, at the request of an individual, provide access to that individual to any Personal Information held by Prodigy Gold about that individual. In accordance with the Act, Prodigy Gold will not provide an individual access to such Personal Information in certain circumstances. These circumstances include where providing access would reveal commercially sensitive information about the organisation, where providing access would have an unreasonable impact on the privacy of others, or where providing access would be unlawful.

An individual can seek access to, and update or correct, any Personal Information that is being held by Prodigy Gold about that individual by contacting Prodigy Gold.

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## **7. COMPLAINTS, CONCERNS AND QUERIES**

Any complaints, concerns or queries about any Personal Information that may have been collected, used or disclosed by Prodigy Gold, this Privacy Policy; or a breach of the AAPs are to be referred to Prodigy Gold's Company Secretary.

### **Contact Us**

Prodigy Gold has appointed the Company Secretary a Privacy Officer to manage privacy enquiries and complaints; who can be contacted by phone, post or email at:

**Address:**

Prodigy Gold NL, Level 1, 67 Smith Street, Darwin NT 0800

**Telephone:** (08) 9423 9777

**Email:** [jzimmermann@prodigygold.com.au](mailto:jzimmermann@prodigygold.com.au)

Information can also be obtained at the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au)

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**8. BOARD APPROVAL**

This Privacy Policy will be periodically updated and amended by the Board to ensure it is operating effectively and required changes are made.