

Privacy Statement Policy

1 PURPOSE

All references to Gold Road, 'we', 'us' or 'our' means Gold Road Resources Limited and its associated entities within the meaning of s 50AAA of the Corporations Act 2001 (Cth).

Gold Road respects your privacy and is committed to ensuring that information held by individuals is collected, handled and protected appropriately.

This Privacy Statement outlines how Gold Road collects, uses, shares, protects and discloses Personal Information in accordance with the Australian Privacy Principles (**Principles**) outlined in the Privacy Act 1988 (Cth) (**Privacy Act**). The Privacy Statement does not apply to the management of employee records as they are exempt from the Privacy Act.

2 DEFINITIONS

- **Personal Information** means information recorded in any format that identifies or could identify an individual personally, either by itself or together with other information that is available to us and includes Sensitive or Health Information.
- **Sensitive Information** 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 association, trade or professional association or trade association, membership of a trade union, sexual preferences or practices or criminal records.
- **Health Information** means information or an opinion about the health or disability of an individual.
- **Business Purpose** means a purpose that is directed at Gold Road achieving its business objectives and that complies with all relevant laws and regulations, including:
 - managing human resources, including employment history, training and qualifications, performance information and information needed to pay salaries and other benefits;
 - managing business relationship with customers, suppliers and external parties for business purposes such as supplying goods or acquiring services;
 - managing shareholder and investor relationships, including for the purposes of issuing and transacting shares, paying dividends, regulatory reporting (including for tax purposes);
 - managing safety, security and other legal obligations including anti-money laundering and whistleblower legislation; and
 - managing community relationships from members of the community where Gold Road conducts mining and exploration operations for the purposes of engaging and interacting with those communities.
- **Process** means any action(s) taken in relation to personal data including collecting, using, disclosing, recording, organising, storing, transferring, amending, deleting, destroying, retrieving, accessing, hosting or otherwise handling

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3 HOW PERSONAL INFORMATION IS COLLECTED

We may collect and retain Personal Information about you including when:

- you interact with us by sending us emails or other correspondence or provide a business card in a personal meeting
- you acquire shares in Gold Road (ASX: GOR)
- you complete and submit an online form
- you apply for a job with us
- we respond to your queries
- you use our IT systems
- you visit our physical locations (such as our offices, workshops, facilities or mine sites).

If you provide us with someone else's Personal Information you must ensure they have consented to that information being provided to us for a particular purpose in accordance with the requirements of this Privacy Statement.

4 PURPOSE FOR THE COLLECTION OF PERSONAL INFORMATION

The Personal Information which we may Process may include your name, email address, postal address, contact details, identification information, positions held and forms submitted.

4.1 Why we collect Personal Information

We may retain and Process personal data for specific and limited purposes. In particular, we only retain and Process your personal data:

- for a Business Purpose, including marketing to investors or potential investors in Gold Road
- for a related purpose(s) that the you would reasonably expect
- for other purposes that you consent to
- in order to comply with our legal obligations.

If you interact with us by sending us emails or other correspondence or we otherwise respond to your queries, then we may also collect your Personal Information for the purposes of responding to your query and providing any other information that you may require.

4.2 What we do with your Personal Information when you apply for jobs with us

If you submit an application for employment or otherwise participate in any recruitment process undertaken by or on behalf of us, we:

- Will use Personal Information about you for the purposes of assessing your application for employment including to verify your identity, to conduct screening checks, consider and contact you regarding other positions and to manage our relationship with you

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- May exchange your Personal Information with academic institutions, recruiters, professional bodies and organisations, screening check providers, joint venture partners and referees
- May retain information as part of our employment application records in order to assess other relevant employment opportunities which may arise within our organisation or with our joint venture partners from time to time
- May use Personal Information to prevent, detect and prosecute fraud and other unlawful activity
- May conduct research and statistical analysis with the aim of improving our services
- May use, retain and disclose Personal Information in order to comply with our legal obligations.

Without your Personal Information we may not be able to consider you for positions with Gold Road.

If you are a contractor or a principal, director, officer, employee, sub-contractor, agent or representative of a contractor engaged by us, we may collect, use and disclose your Personal Information for the reasons set out below:

- As may be required by law, for the performance of the contract and for compliance with our policies governing your access to and presence on our sites
- To the extent necessary to evidence our compliance with laws, to maintain proper contractual records and to evidence compliance with our policies.

4.3 What we do with your Personal Information when you visit our sites

If you are a visitor to our sites, we may also collect your Personal Information to satisfy our site entry requirements, safety procedures and statutory obligations and we may not be able to do these things without your Personal Information.

5 HOW HEALTH INFORMATION IS COLLECTED

In certain circumstances, Gold Road may collect Health Information by the same means (but not limited to) as listed above. Gold Road will not collect Health Information unless reasonably necessary for one or more of its functions and will seek your consent prior to collecting or storing your Health Information.

Additionally, Gold Road may collect Health Information indirectly from a health service provider who has assessed or treated you such as:

- A GP or medical specialist
- A hospital where you have received treatment
- a health practitioner (such as a psychologist or physiotherapist).

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6 PURPOSE FOR COLLECTION OF HEALTH INFORMATION

To enable us to:

- Provide medical assistance and treatment in the event of a medical emergency
- Assess your fitness for work
- Assess compliance with relevant alcohol and drug testing procedures or policies.

We may collect, hold, use and disclose certain Health Information about you.

7 USE OF HEALTH INFORMATION

We only hold, use and disclose Health Information about you for the purposes outlined in the section above, or for directly related purposes which might be reasonably expected, unless we otherwise obtain your consent.

We may disclose your Health Information outside Gold Road and its affiliates to third parties, such as:

- Gold Road's external medical providers
- Gold Road's alcohol and drug testing providers
- Joint venture partners
- Government agencies (including Centrelink), law enforcement bodies, courts and dispute resolution schemes
- Emergency service agencies or providers, including the Royal Flying Doctor Service of Australia.

If we use it any way which you might not reasonably expect and which is not directly related to the safety and security of our work locations, we will ask for your consent.

8 COLLECTION AND USE OF COOKIES, CLICKSTREAM DATA AND WEBSITE TECHNOLOGY

We use cookies. A cookie is a small amount of data that some websites place on your computer when you visit them. A website may use cookies to track the pages you have visited.

When you visit our website, our servers record:

- Your server (IP) address and machine name
- The date and time of visit to our website and time spent on particular pages
- Pages accessed and documents downloaded
- The number of bytes transmitted and received for each request
- The previous site or page visited
- The search engine and keywords used

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- Any linked referral
- The type of browser used and its operating system (collectively called “clickstream data”).

We may examine clickstream data to determine the traffic through the server as well as access levels to specific pages. No attempt will be made to identify you or your browsing activities from clickstream data except in the circumstances specified below.

You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to access certain areas of our website or take advantage of the improved website experience that cookies offer.

If we or any authority suspect that unauthorised access or use of the website has occurred or may occur or be attempted, we may gather, use and disclose more extensive information than indicated above regarding access or attempted access to the website for the purposes of prevention, detection, investigation and/or prosecution.

Our website may contain links to third party sites. These websites should contain their own privacy statements that we recommend you review. Gold Road is not responsible for the privacy practices of these third parties and the content of third party websites.

9 SHARING YOUR PERSONAL INFORMATION

We may share your Personal Information in the following circumstances:

- With Gold Road affiliates for employment related or administrative purposes
- Our joint ventures partners for employment or other administrative purposes
- With companies that perform services on our behalf, for example technical infrastructure support or administrative services
- With emergency service agents or providers, including the Royal Flying Doctor Service of Australia, in the event of an emergency.

Our service providers are required to use the Personal Information that we share with them only for the purpose for which we provide it to them. They must:

- Take appropriate measures to protect the confidentiality, integrity and security of your Personal Information
- Not use or share your Personal Information in a manner that would be inconsistent with this Privacy Statement
- Comply with all applicable privacy and data protection laws.

If another entity has acquired a Gold Road subsidiary, or all or substantially all of the assets of Gold Road or a subsidiary (for example in the event of a sale, merger, reorganisation, insolvency, dissolution or liquidation) we may transfer your Personal Information to that entity provided that the acquiring entity’s use of information will still be subject to this policy or all applicable privacy and data protection laws.

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We may also be required to disclose your Personal Information to:

- Comply with a law, regulatory requirement, court order or a subpoena
- Comply with law enforcement or other governmental investigations
- Protect your and our legal rights, property and safety, our employees, agents and other people.

10 MANAGEMENT OF AND ACCESS TO PERSONAL INFORMATION

We will update any changes or errors in the Personal Information which we hold about you upon receipt of written evidence from you which satisfies us that a correction is required. Any requests for correction of your Personal Information will be completed in a reasonable time period and should be directed to CoSec@goldroad.com.au.

10.1 How to access your Personal Information

Depending on the Personal Information you seek, we may ask you to:

- Complete an information request form
- Verify your identity in writing
- Pay a fee if the inquiry involves administrative time or resources.

Once the above steps have been complied with we may provide you with access to your Personal Information if:

- It is practicable for us to do so and we have no other reasonable grounds for refusing access
- The request is not frivolous or vexatious
- Access will not have an unreasonable impact on the privacy of others
- The information does not relate to existing or anticipated legal proceedings (other than information accessible through the discovery process)
- Access will not reveal our intentions in relation to any negotiations with you
- Access is not unlawful
- Denying access is not required or authorised by law
- Access will not prejudice any prevention, detection, investigation and/or prosecution of possible unlawful or improper activity.

11 DESTRUCTION AND DE-IDENTIFICATION OF PERSONAL INFORMATION

If we no longer require Personal Information, we will take reasonable steps to permanently destroy or de-identify that information.

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12 DIRECT MARKETING FOR INVESTOR PURPOSES

We may use personal information for Gold Road's investor marketing, including emailing announcements lodged by Gold Road on the ASX, updated Company Presentations, advising of upcoming investor functions or marketing trips, or other promotional information relating to Gold Road.

If you do not wish to receive the information, you can unsubscribe at any time by emailing perth@goldroad.com.au or selecting the unsubscribe button at the bottom of the relevant email.

13 UNSOLICITED PERSONAL INFORMATION

If Gold Road has received any unsolicited Personal Information that is not required for a permitted purpose, Gold Road will (if lawful and reasonable to do so) destroy the information or ensure that the information is de-identified as soon as practicable.

14 PROTECTION OF PERSONAL INFORMATION

We may hold your Personal Information in physical and electronic form both at our premises and with the assistance of our data storage service providers in Australia. We implement a range of reasonable physical, technical and organisational controls to manage and protect the security of personal data. We train our staff to handle Personal Information and restrict access where appropriate.

15 DATA BREACHES

Gold Road will take action to mitigate the risk of loss or harm in the event of unauthorised access or disclosure of Personal Information (**Data Breach**). If applicable, in the event of a serious eligible data breach, Gold Road will report in accordance with legislative requirements to the Office of the Australian Information Commissioner and notify the affected individuals.

Gold Road requires its contractors and suppliers to promptly notify Gold Road if a Data Breach occurs by email notification to the Gold Road Privacy Officer at CoSec@goldroad.com.au.

16 CROSS BORDER DISCLOSURE OF PERSONAL INFORMATION

Our website and databases currently reside on servers in Australia. We may cooperate with various sub-contracted data processors in countries across the world. We request data processors to comply with all applicable laws relating to privacy and the disclosure of data that apply in Australia.

17 PRIVACY OFFICER

If you have any concerns or questions about Gold Road's Privacy Statement, please contact our Company Secretary (the designated Privacy Officer) at CoSec@goldroad.com.au

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18 COMPLAINTS PROCESS

We have a process for dealing with complaints about Gold Road’s use, storage and access to Personal Information. If you would like to lodge a complaint or have concerns about how your Personal Information has been handled by Gold Road, please contact our Company Secretary at CoSec@goldroad.com.au.

Your complaint will be acknowledged upon receipt and we will endeavour to provide a written response within 30 days of our initial acknowledgement.

19 UPDATES TO THIS STATEMENT

Our Privacy Statement will be reviewed and amended from time to time at our discretion to take account of changes to new laws, new technology and business requirements. This Privacy Statement was last updated 9 May 2019.

19.1 Company Secretary

If you have any concerns or questions, please contact our Public Interaction Line by:

Telephone +61 8 9322 1600 or email CoSec@goldroad.com.au

20 DOCUMENT CONTROL

Version	Revision Dates	Owner	Approver
Version 1	Issued: 08/05/2019	Company Secretary	Gold Road Resources Board