

## 1. PURPOSE

---

All references to Gold Road, 'we', 'us' or 'our' means Gold Road Resources Limited (**Gold Road or the Company**) and all subsidiaries within the Gold Road group of companies.

Gold Road collects Personal Information from a range of individuals in the context of our business activities including our People; job applicants; representatives of our suppliers; contractors and joint venture partners; shareholders; users of our website and visitors to our operational and office sites.

Gold Road respects your privacy and is committed to ensuring that Personal 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**) and how you can exercise your privacy rights. The Privacy Statement does not apply to the management of employee records as they are exempt from the Privacy Act.

## 2. DEFINITIONS

---

- **Our People** include our Directors, officers, employees and contractors (e.g. labour hire, temporary staff, secondees).
- **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 relationships with customers, suppliers and external parties for business purposes such as supplying goods or acquiring services;
  - managing shareholder and investor relationships, including issuing and transacting shares, paying dividends, and 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 to engage and interact 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.

## 3. HOW PERSONAL INFORMATION IS COLLECTED

---

We may collect and retain Personal Information about you in the following ways:

### 3.1 Information that you provide voluntarily

At times, Gold Road may ask you to voluntarily supply Personal Information. For example, we may ask you to provide your contact details:

- When you submit enquiries to us through the Contact Us page on our website,
- When you request to receive information from us
- When you acquire shares in Gold Road (ASX: GOR)
- When you submit a job application :
- During the course of our business interactions with you, including from any communications you send or provide us.
- When you visit our physical locations (such as our offices, facilities or operation sites).

### 3.2 Information that we collect automatically

When you visit our website or use our products and services, we may collect certain information automatically from your device. Specifically, we may collect information like your device type, unique device identification numbers, browser type, broad geographical location and other technical information from you.

We use this information for our internal operations and analytics purposes and to improve the quality and relevance of our website, products and services. Some of this information may be collected using cookies and similar technology. Please refer to Section 8 for further information on our use of cookies.

### 3.3 Information that we obtain from third-party sources

In some cases, we may collect Personal Information about you from publicly available sources or from a third party, such as through your representatives, contractors who provide services to us, or other third parties who are entitled to share that information. In addition, where you have expressed an interest in career opportunities with Gold Road, we may obtain Personal Information provided to us by HR practitioners, hiring managers and recruitment advisors.

If you provide us with someone else's Personal Information (for example your referees or authorised representatives) 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 Policy.

## 4. PURPOSE FOR THE COLLECTION OF PERSONAL INFORMATION

---

Personal Information can extend to any information where you can be identified directly or indirectly. The Personal Information that 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 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 if we otherwise respond to your queries, then we may also collect your Personal Information to respond to your query and provide 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 apply for employment or otherwise participate in any recruitment process undertaken by or on behalf of us, we:

- Will use Personal Information about you to assess your application for employment including verifying your identity, conducting screening checks, considering and contacting you regarding other positions and managing our relationship with you
- 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 to improve our services
- May use, retain and disclose Personal Information 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 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 operation 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.

## 4.4 Sensitive Personal Information

Under privacy laws, certain categories of Personal Information are considered particularly sensitive and therefore need additional protection. This includes information about racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, trade union membership, health or medical conditions, genetic or biometric information, sexual orientation, or criminal convictions and offences. Gold Road will only collect, manage and use your Sensitive Personal Information where we have obtained your explicit consent or where we have other lawful grounds to do so under applicable law.

## 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 before 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).

## 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 in any way that you might not reasonably expect and that 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 or mobile device when you visit them. A website may use cookies to track the pages you have visited.

When you visit our website, our servers record:

- Information (where applicable) about your computer or mobile device, including 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
- 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 prevention, detection, investigation and/or prosecution.

To learn more about cookies and how to manage them, visit [allaboutcookies.org](http://allaboutcookies.org).

## 9. LINKS TO OTHER WEBSITES AND SOCIAL MEDIA

---

Our website may contain links to third-party sites including social media platforms. These websites should contain their 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. Your use of other websites and social media features could lead to the collection or sharing of information about you.

Those websites and social media platforms are not subject to this Privacy Policy. Gold Road encourages you to review the privacy guidance and settings of each website and social media platform with which

you interact to assess whether the guidance and settings are satisfactory to you in relation to the collection, use and disclosure of information by those websites and platforms.

## 10. HOLDING AND PROTECTION OF YOUR PERSONAL INFORMATION

We may hold your Personal Information in electronic or in hard copy form. We may keep this information at our premises, or sites managed by our service providers or joint venture partners.

We are committed to keeping your Personal Information safe, confidential, and secure. We use a range of physical, electronic and procedural safeguards to do this. We update these safeguards from time to time to address new and emerging security threats. We also train our People on privacy matters as appropriate and seek to limit access to Personal Information to those of our People who need to know that information.

### 10.1 Retention of Personal Information

We retain the Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested, or to comply with applicable legal, tax or accounting requirements).

Gold Road aims to keep your Personal Information for no longer than is necessary for compliance or other legitimate business purposes. We apply our standard document retention and disposal procedures and processes to records that include Personal Information. These procedures and processes take account of document retention requirements in accordance with relevant legal and regulatory requirements. For more information on our document retention practices please contact us using the details below contained in this policy.

## 11. SHARING YOUR PERSONAL INFORMATION

Unless you specify otherwise, we may share your Personal Information in the following circumstances:

- With Gold Road affiliates for employment-related or administrative purposes
- Our joint venture 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.

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.

## 12. 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 period and should be directed to a Company Secretary (the designated Privacy Officer) at [CoSec@goldroad.com.au](mailto:CoSec@goldroad.com.au).

You can also opt out of any marketing communications we send you at any time. You can exercise this right by emailing [perth@goldroad.com.au](mailto:perth@goldroad.com.au) or following the unsubscribe instructions on such communications.

### 12.1 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.

## 13. 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.

## 14. 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](mailto:perth@goldroad.com.au) or selecting the unsubscribe button at the bottom of the relevant email.

## 15. 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.

## 16. 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](mailto:CoSec@goldroad.com.au).

## 17. 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.

## 18. PRIVACY OFFICER

---

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



## 19. 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 a Company Secretary at [CoSec@goldroad.com.au](mailto: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.

If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (OAIC). Contact details can be found at the OAIC's website [www.oaic.gov.au](http://www.oaic.gov.au).

## 20. 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. Please visit our website at [www.goldroad.com.au](http://www.goldroad.com.au) to obtain a copy of the latest version of this policy at any time.

### 20.1 Company Secretary

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

Telephone +61 8 9200 1600 or email [CoSec@goldroad.com.au](mailto:CoSec@goldroad.com.au)

## 21. DOCUMENT CONTROL

---

Version Number	Revision Date	Document Owner	Document Approver
Version 2.0	8 December 2023	Company Secretary	Board of Directors