

PRIVACY STATEMENT

Covalent Lithium Pty Ltd (ACN 623 090 139) (**Covalent**) manages individual privacy and the security of personal information in accordance with the Privacy Act 1988 (Cth) as amended from time to time (the **Privacy Law**).

1. Purpose of Privacy Statement

The purpose of this Privacy Statement is to provide:

- (a) a framework that governs how Covalent manages the collection, use, disclosure, protection and disposal of certain personal information to ensure Covalent at all times complies with the Privacy Law; and
- (b) information to persons from whom Covalent may collect certain personal information, as well as the public in general, regarding the information collection and handling practices of Covalent.


2. What is Personal Information and What Personal Information does Covalent Collect?

Personal information is any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true or not and whether or not the information is recorded in a material form or not (**Personal Information**). Personal Information also includes Sensitive Information as defined in item 6 of this Privacy Statement below.

The type of Personal Information that Covalent may collect is broad and will depend on the circumstances in question, but may include a person's name, address, phone number, email address or other contact details, medical records, employment history, bank account details, photos, videos or details of membership to any association or organisation. In relation to visitors to any Covalent website, Covalent may also collect certain electronic information as outlined in item 8 of this Privacy Statement below.

3. Collection and Holding of Personal Information

Covalent only collects Personal Information that is reasonably necessary for it to perform its business functions and activities. All Personal Information Covalent collects is collected, used, disclosed and otherwise treated in accordance with the law, including but not limited to the

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Privacy Law. Where possible, Covalent collects Personal Information directly during the course of its relationship with individuals. Where this is not possible, Covalent may also collect Personal Information by other means, such as where such information is given to Covalent by the relevant individual.

Generally and where practicable, the primary purpose of the collection will be made clear to an individual before or at the time of collecting the individual's Personal Information. A typical purpose for which Covalent may collect Personal Information may include one or more of the following:

- (a) assessment of a potential employee or contractor's suitability for a particular role;
- (b) sending information regarding an existing or potential employee or contractor to stakeholder or potential;
- (c) deciding or seeking approval to engage an employee or contractor or on-board an individual to a particular project;
- (d) monitoring, reviewing and assessing the performance of an employee or contractor of Covalent;
- (e) otherwise contacting an employee, contractor or client of Covalent;
- (f) ensuring the security and safety of all Covalent personnel and property;
- (g) responding to a complaint or conducting an investigation;
- (h) statistical reasons, such as recording/monitoring demographics and complying with Australian participation obligations; and
- (i) ensuring the prompt payment of Covalent contractors and employees.

If you do not want Covalent to use, collect, disclose or access your Personal Information, please notify Covalent at the time it requests your Personal Information.

4. Use and Disclosure of Personal Information

Primarily, Covalent will use, hold and disclose Personal Information in connection with the supply of its products, services or information or otherwise for a legitimate business purpose, to the extent permitted by law, and for a purpose for which it was collected. Covalent only uses and discloses Personal Information for a purpose other than its primary purpose, without the consent of the individual concerned, when disclosure is directly related to the primary purpose of collection.

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As part of its primary purpose, Covalent may be required to share Personal Information with other parties with which it conducts business, including but not limited to Covalent's existing or proposed:

- joint venture partners, affiliates and stakeholders;
- service providers, such as contractors, recruitment agents, technology and security services;
- professional advisors including lawyers, auditors and accountants; and
- other contractors that assist Covalent to provide its business.

Covalent ensures that any disclosure is limited to what is necessary and allowed by the Privacy Law and/or any other law.

5. Related Body Corporate

Covalent may disclose Personal Information to its Related Bodies Corporate, as that term is defined in the *Corporations Act* 2001. In this scenario, the Related Body Corporate must use such Personal Information for the original primary purpose for which Covalent collected the information, or a related purpose, to the extent permitted by the Privacy Law and/or any other law.

6. Sensitive Information

Sensitive Information includes information about 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, or health records. Covalent does not collect Sensitive Information without an individual's consent, other than as permitted by the Privacy Law and/or any other law.

7. Anonymity and Pseudonymity

Wherever lawful and practicable, Covalent respects the right of an individual to remain anonymous, or use a pseudonym, when dealing with Covalent.

8. Website Privacy

a) Access to website

When accessing Covalent's website, Covalent may record and log information for statistical and security purposes. Covalent uses this information to analyse its site's usage and performance and to refine and develop our site.

b) Hyperlinks

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Covalent does not warrant or make any representations with respect to the privacy policies or practices of operators of other websites where Covalent provides a hyperlink to that website on Covalent's website.

9. Security of Personal Information

The security of Personal Information is of utmost importance to Covalent. Covalent takes all appropriate action and reasonable precautions to safeguard and protect Personal Information that it collects from loss, interference, misuse, unauthorised access, modification or disclosure.

Covalent utilises a number of means to protect Personal Information including:

- external and internal premises security;
- maintaining and reviewing technology; and
- internal policies with respect to computer usage.

10. International/ Cross-Border Disclosure of Personal Information

Covalent (including its joint venture partners, affiliates and stakeholders) operates and conducts business in various international locations.

Covalent may be required to disclose Personal Information to parties who are not located in Australia or an external Territory (including but not limited to overseas clients, joint venture partners, affiliates) (**Overseas Recipient**) as part of Covalent's primary functions and activities, locations of which may include but are not limited to United Kingdom, United States of America, the People's Republic of China and Chile. Examples of the type of Personal Information that may be disclosed by Covalent to Overseas Recipient's, and the purposes for which Covalent may use and disclose such Personal Information, may be found in Section 3 and Section 4 of this Privacy Statement above.

Covalent will take such steps as are reasonable in the circumstances to ensure that an Overseas Recipient does not breach the Australian Privacy Principles in relation to the information.

11. Access and correction to personal information

Generally, Covalent endeavours to comply with any reasonable request to detail our information handling practices. Sufficient steps are taken, in a general way, to outline the type of Personal Information Covalent holds, for what purposes and how such information is collected, used and disclosed.

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An individual may request access to any of the Personal Information that Covalent holds about them. Covalent will provide an individual with access to Personal Information pertaining to them following a reasonable request and upon the verification by Covalent, to its reasonable satisfaction, of the identity of that individual.

In some circumstances, Covalent may refuse access to Personal Information where Covalent is required or authorised to do so by law, including where the request for access may be regarded as frivolous or vexatious. If a request for access to Personal Information is denied, Covalent will explain the reason for the denial.

Covalent will also take appropriate action to correct any Personal Information which is deemed to be inaccurate, incomplete or not up to date.

12. Complaints about Breach of Privacy

Complaints regarding Covalent's privacy management can be directed to <http://www.covalentlithium.com/about-us/contact-us> or [compliance at covalentlithium.com](http://www.covalentlithium.com/compliance). If you are not satisfied with the result of your complaint you can refer your complaint to the Office of the Australian Information Commissioner (OAIC) in writing by completing the online Privacy Complaint form on OAIC's website at www.oaic.gov.au/privacy/making-a-privacy-complaint. Alternatively, you may send your completed Privacy Complaint form to:

Email: enquiries@oaic.gov.au

Facsimile: +61 2 9284 9666

Post: Sydney Office – GPO Box 5218 Sydney NSW 2001
Canberra Office – GPO Box 2999 Canberra ACT 2601

OAIC Enquiries line by telephone is 1300 363 992. Or if calling from outside Australia call: +61 2 9284 9749.

13. Responsibilities within Covalent

The Chief Executive Officer of Covalent is accountable to the Covalent's Board of Directors for ensuring that this Privacy Statement is implemented throughout Covalent's operations.

Covalent's Legal Department is responsible for the management and implementation of this Privacy Statement.