

COBRE 

Corporate Privacy Policy

## 1 BACKGROUND

This privacy policy describes the ways in which Cobre Limited processes and protects your personal information and data. In this policy, all references to “Cobre”, “we” or “us” refers to Cobre Limited and any of our officers, employees, agents or assigns.

### 1.1 Australian Privacy Policy

We are listed on the Australian Securities Exchange, and collect, protect, use and store the personal information of our shareholders. In this policy, all references to our “services” refers to the services we offer to our shareholders, potential investors and other Australians regarding our corporate activities in Australia and any related administrative or secondary operations we may engage in or provide (**Services**).

### 1.2 Privacy Commitment

We value your privacy and are committed to safeguarding your personal information, which we receive in connection with our Services. To achieve this commitment to privacy, we comply with the Australian Privacy Principles and the Notifiable Data Breach Scheme contained in the *Privacy Act 1988* (Cth) (**Privacy Act**). This legislation governs the way we collect, use, disclose and store your personal information and how we notify you in circumstances where your information is lost or accessed without authorisation. For further information regarding Australia’s privacy legislation, please refer to the Office of the Australian Information Commissioner:

- online at [www.oaic.gov.au](http://www.oaic.gov.au);
- by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au); or
- by telephone on 1300 363 992.

### 1.3 Application

By becoming a shareholder or accessing our website, communicating with us or otherwise providing us with personal information in connection with our Services, you confirm that you have read and agree to the terms of this policy and expressly consent to the collection, storage, use and disclosure of your personal information in accordance with the terms of this policy.

If you do not feel comfortable with any aspect of this policy, or do not agree to the terms of this policy, please immediately discontinue the use of our Services and contact the Company.

## 2 INFORMATION WE COLLECT

### 2.1 Personal Information

In this policy “personal information” refers to any information or opinion about you that we may hold where you are identifiable or reasonably identifiable from that information or in connection with other information accessible to us. Personal information will often include your name, contact details, and financial details but will also include other information about you, such as your communication habits and commentary or opinion about you. Further information on the personal information we generally collect about you is outlined below.

## 2.2 Collection of Personal Information

We collect information about you in order to provide you with our Services. You may choose whether to provide us with this information, however your choices may affect our ability to offer you part or all of our Services.

Personal information we collect may include:

- (a) **Contact Information:** when you use our Services you may provide personal information such as your name, date of birth, gender, email address, contact information and any other information which you may provide;
- (b) **Shareholder Information:** when you become a shareholder you will provide us information about your shareholding, such as identity details and other information such as banking details and tax file numbers for the payment of dividends and other amounts;
- (c) **Communication Information:** when you communicate with us via telephone, email, SMS or online we will collect your contact information and any other information you choose to provide to us;
- (d) **Cookie Information:** when you access our website, we (including companies we work with) may place small data files on your computer or any other device. These data files may be cookies, pixel tags, e-tags, 'flash cookies' or other local storage provided by your browser or associated applications, which are collectively referred to as "cookies" in this policy. We use these cookies to recognise you, customise our Services and content, measure engagement, ensure your security, mitigate risk and prevent fraud and to promote trust and safety across our site. You are free to decline our cookies in your browser if your browser or browser add-on permits unless our cookies are required to prevent fraud or ensure the security of the websites we control. However, we note that declining our cookies may interfere with your use of our website and our Services.
- (e) **Third Party Information:** whenever reasonable and practical to do so, we will collect personal information about you directly from you. However, in some cases we may be required to collect personal information about you from third parties such as regulatory bodies or the ASX and other third parties which may be relevant to our Services such as the government, your employer, credit reporting agencies or from public sources. Where we collect information about you from a third party, we will take reasonable steps to ensure that you are made aware of the fact and circumstances of that collection. We may also receive information from third parties where you have authorised the third party to do so.
- (f) **Third-party Plugin Information:** In some cases, we may have integrated a third-party plugin into our website. The use of such third-party plugins may result in data collection by both us and the relevant third party. We do not control the information you share with third parties via these plugins. You should refer to the third party's privacy policy to understand their data handling practices.

## 3 WHY WE COLLECT INFORMATION

### 3.1 Why We Collect Your Personal Information

We collect your personal information in order to carry out our Services in the most professional and efficient manner possible. We use your information for the purpose for which it was collected. Some examples of why we collect your personal information include:

- (a) to provide our Services to you;
- (b) to identify our shareholders and potential shareholders;
- (c) to manage your shareholding, including contacting you in connection with your shareholding and to process payments to you;
- (d) to provide shareholder support;
- (e) to comply with legal obligations;
- (f) to resolve disputes;
- (g) to respond to your enquiries;
- (h) to detect, prevent and investigate potential or actual fraud to you, us or any third party;
- (i) to compare information provided by you for accuracy and to verify that information with third parties where permitted and appropriate; and
- (j) to enable third party service providers to provide us with services such as information technology, auditing, legal advice, printing and mailing services and services relating to our securities register.

### **3.2 Secondary Purposes for Collection**

Where your personal information is not 'sensitive information' (which includes information regarding your health, racial or ethnic origin, sexual orientation, political beliefs, philosophical beliefs, union or association membership and criminal history) we may use your information for reasonably expected secondary purposes related to the purposes set out in the "Why We Collect Your Personal Information" paragraph above.

In addition, we may also use your personal information as otherwise authorised by law.

## **4 INFORMATION WE DISCLOSE**

### **4.1 Who We Disclose Your Personal Information To**

We will only disclose your personal information to the extent required to provide our Services to you, for the purposes outlined in the "Why We Collect Your Personal Information" paragraph above, or as you otherwise consent or authorise.

We are not in the business of selling your personal information. We consider the privacy of this information to be a vital part of our relationship with you. Therefore, we will not sell your personal information to third parties, including third party advertisers.

### **4.2 Third Party Disclosure**

In connection with the purposes of collection or as otherwise permitted under the Privacy Act, we may disclose your personal information to third parties such as:

- (a) our related entities;

- (b) our service providers and professional advisors such as information technology, auditing, legal advice, printing and mailing services and services relating to our securities register;
- (c) government agencies; and
- (d) financial institutions.

We will take all reasonable steps to ensure that third parties we disclose your personal information to maintain and protect the privacy and security of your personal information and only use that information for the purposes for which it was disclosed.

### **4.3 Overseas Data Transfer**

We will not send your personal information to recipients outside of Australia without first:

- (a) taking reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles, the Privacy Act and this policy;
- (b) obtaining your consent; or
- (c) otherwise complying with the Privacy Act.

We may disclose your personal information overseas when strictly necessary to do so in connection with our Services, such as when making international payment or complying with foreign legal or regulatory requirements. Such disclosure may result in your personal information being sent to entities located in foreign jurisdictions.

Our operations are generally located in Australia, however we may use cloud computing solutions or data storage which may be stored, under our control, in servers located outside of Australia.

You consent to such overseas transfers and storage, provided that they are otherwise in accordance with this policy.

## **5 HOW WE HANDLE INFORMATION**

### **5.1 Personal Information Security**

We take reasonable steps to protect personal information we hold at all times.

We store and process your personal information in accordance with physical, electronic and procedural safeguards to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. We, in collaboration with our third party service providers, maintain physical security measures to guard against unauthorised access to systems and electronic safeguards such as firewalls and data encryption. We ensure that access to your personal information is limited to authorised employees who require that access to fulfil the responsibilities of their job.

We, and our third party service providers, perform yearly stringent information security audits to ensure proper implementation of our physical, electronic and procedural safeguards. The audits we undertake include Sarbanes Oxley Compliance. We also actively engage in ad-hoc “white hat” activities on our Services to ensure data is stored and protected at the highest level.

## **5.2 Information Retention**

We will only retain your information for as long as required for the purposes for which the information was collected, or to comply with legal obligations or resolve disputes.

We will take reasonable steps to destroy or de-identify your personal information when we are no longer permitted to keep it.

## **5.3 Data Breaches**

Where we detect misuse, loss or unauthorised access to or modification or disclosure of your personal information, we will comply with all relevant provisions of the Notifiable Data Breach Scheme operated under the Privacy Act.

# **6 YOUR RIGHTS & CHOICES**

## **6.1 Anonymity & Pseudonymity**

You are entitled to engage with us on an anonymous or pseudonymous basis where it is practical to do so. If you request, we will engage with you on an anonymous or pseudonymous basis to the extent possible while allowing us to provide our Services to you or complying with our regulatory obligations.

## **6.2 Access & Correction**

You are entitled to access the personal information we hold about you and may request that we correct any errors in the information we hold. If you would like to access or correct your personal information held by us, please contact our Privacy Officer at the address below.

We will take reasonable steps to allow you to access your information unless circumstances exist that would prohibit us from doing so.

We will correct your personal information where we are satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading. If we correct any personal information that we have disclosed to third parties we will take reasonable steps to notify those parties of the change or update. You accept that following a request to correct your information we may be required to take reasonable steps to verify your identity or the personal information, which may include confirmation with third parties.

If we refuse to provide you with access to, or the correction of, your personal information that we hold we will provide reasons for such refusal in accordance with the Privacy Act.

# **7 HOW TO CONTACT US**

## **7.1 Queries**

If you have any queries or concerns or would like to discuss any matter concerning your privacy, please contact the Company.

## **7.2 Complaints**

If you are concerned that we may have breached the Australian Privacy Principles or the Privacy Act, please contact us immediately. We will undertake a reasonable and expeditious assessment of the concern and suggest relevant resolution processes.

Alternatively, you may wish to contact the Office of the Australian Information Commissioner.

## **8 CHANGES TO THIS POLICY**

We may update this policy from time to time. If we change this policy in any material way, we will post a notice on our website prior to the change becoming effective for a period of 30 days. We encourage you to periodically review this page for the latest information on our privacy practices.

The effective date of this policy is 18 November 2019.