



Privacy Policy

Panoramic Resources Ltd (ABN 47 095 792 288)

Adopted by the Board on 2 July 2020

Panoramic Resources Ltd – Privacy Policy

1. Applicability

This Privacy Policy sets out how Panoramic Resources Ltd (ABN 47 095 792 288) and its subsidiaries (“Panoramic”) collect, use, disclose and hold personal information that we collect about persons who engage with us.

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

We:

- train personnel about their obligations and the importance of maintaining confidentiality, security and privacy in respect of personal information;
- internally gather, maintain and deal with personal information securely, and
- ensure that business partners of Panoramic are aware of and adhere to their obligations pertaining to personal information.

2. Personal information we may collect

Panoramic collects personal information in order to carry out its business functions and activities.

For example, we may collect personal information:

- in the course of carrying out employee-related activities such as training and consulting;
- about individuals seeking employment with Panoramic;
- to provide you with a product or service;
- to conduct credit checks and assess credit worthiness;
- to manage our relationship with you, either as a customer, shareholder or other stakeholder;
- to comply with our legal and regulatory obligations; and
- for other purposes required or authorised by law, including purposes for which you have provided your consent.

(a) Customers, potential customers, suppliers and potential suppliers

As a customer or potential customer and supplier or potential supplier, we may collect your name, current address, telephone number, email address and credit history. We may also collect details of other interactions that you have with us, together with any other information that you choose to provide us with.

In line with modern business practices common to most companies and to meet your specific needs, we may disclose your personal information to third parties. Some of these third parties act on our behalf, and if this is the case we ask that these third parties hold, use and disclose your personal information in accordance with the *Privacy Act (1988)*.

These third parties may include:

- financial institutions for payment processing;
- government and regulatory authorities, where required or authorised by law; and
- external business advisors (such as accountants, auditors, recruiters and lawyers).

(b) Shareholders

If you are a shareholder, the *Corporations Act (2001)* requires us to collect information about your name, address and shareholding, and include this in our register, held by Computershare Investor Services Pty Ltd. This information will continue to be included in the register for seven years after you cease to be a shareholder.

The *Corporations Act* also requires us to grant access to anyone to inspect our share register on request and under certain circumstances, to obtain a copy. We may also provide information from the share register to meet specific requests, such as identifying the top 20 shareholders.

As shareholders, you may also be required to provide us with your tax file number or financial institution account details. When applicable, we may ask for your bank account details to make any dividend and other payments to you. In compliance with Australian tax laws, we also provide certain advice to the Australian Tax Office, including any dividend information.

Under the *Money and Laundering and Counter Terrorism Financing Act 2006* (Cth), our share registry may collect personal information about you (such as your legal name and other names you may be known by, your residential street address and your date of birth) and hold other documents in order to verify your identity. This information is generally not included in the public register and is restricted to authorised share register employees, Panoramic and regulators.

You can view a copy of Computershare Investor Services Pty Ltd's privacy policy at their web-site.

(c) Employment

Job applicants

If you are applying for a position with us, we will ask you for specific personal information, such as your name, e-mail address, telephone number, qualifications and career history. We may also ask you for other information such as your interests and the positions you are interested in.

Any personal information you provide Panoramic in connection with a job application may be used to consider you for current and future employment and may be disclosed to our external advisors to assist in the selection and recruitment process.

Employees

If you are an employee of Panoramic, we will collect employee records, referee reports and other information for personnel files. The handling of your personal information as an employee is exempt from the *Privacy Act* if it is directly related to your current or former employment relationship and an employee record relating to you. We will not disclose your personal information for any purpose other than in relation to your employment relationship with us or as otherwise required or authorised by law.

In certain circumstances Panoramic may collect sensitive information or health information about employees. We will collect this information under the following circumstances:

- when it is provided voluntarily by the individual/employee to which it relates and that individual has consented to the collection of that information; or
- where we are otherwise authorised or required by law to collect that information.

3. How we collect personal information

We may collect personal information in a number of ways, including:

- directly from you, including through our website, by telephone, through written correspondence (such as letters and emails), and in person if you visit our share registry;
- from credit reporting agencies and from third parties; and
- from publicly available sources of information, such as address validation software and telephone directories.

When collecting personal information, Panoramic will take reasonable steps to ensure individuals are aware of the following:

- why we are collecting the information;
 - any laws requiring the collection of that information;
 - who we usually disclose the information to;
 - any consequences for the individual if we are not provided with the information.
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4. Information collected through our website

If individuals access www.panoramicresources.com (the "Website") our system may record information including, but not limited to, the following:

- the date and time of your visit to the Website; and
- the pages accessed and any information downloaded.

This information may be used for statistical and reporting purposes as well as for website administration and maintenance.

The personal information which Panoramic may collect through the Website includes:

- any messages, email address or comments a website user leaves for Panoramic via the Website, e.g. through use of the "Subscribe to Our News" icon or the "Contact us" page; and
 - information provided by a website user when applying for a job at Panoramic via the Website.
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5. Purposes for which we collect personal information

Panoramic may use and disclose the personal information we collect for the following purposes:

- to carry out the activities and functions of Panoramic;
- to maintain our relationships with employees, customers and suppliers;
- for planning, research, security or risk management purposes;
- where a third party acquires, or makes inquiries in relation to acquiring, an interest in Panoramic;
- to the extent that Panoramic is required or authorised to do so by law; and
- for a purpose related to any of those listed above.

We may also use personal information to keep employees and other individuals informed of our activities, events, ASX announcements and other matters including by e-mail or other electronic form. If you do not wish to be contacted for those purposes, please inform Panoramic of this using the contact details given below.

Panoramic may share personal information for the purposes described above or where permitted by law with other entities who are part of the same corporate group and with third parties, including our business and joint venture partners. We may also use or disclose personal information where required or authorised by law, such as in emergency situations and when assisting law enforcement agencies.

Where Panoramic no longer requires the personal information of an individual for one of the purposes outlined above, Panoramic will take reasonable steps to destroy that information.

6. Assessing and updating personal information

We will, on request, provide you with access to the information we hold about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under relevant privacy legislation. If you require access to your personal information, please contact the Privacy Officer as described below. You may be required to put your request in writing for security reasons.

For most requests, your information will be provided free of charge. However, we may charge a reasonable fee if your request requires a substantial effort on our part.

If an employee wishes to seek access to or request correction of any personal information held by Panoramic about the employee, Panoramic encourages that employee to contact the Company Secretary who will make the change/provide the information where required.

In certain circumstances, Panoramic may be permitted by law to refuse access to personal information or refuse to correct or alter that personal information. If that is the case, Panoramic will give the individual concerned reasons for the decision not to provide/correct the information.

Panoramic will take all reasonable steps to make sure that the personal information we collect, use, and disclose is complete, accurate and up-to-date. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

7. Security of personal information

We store information in different ways, including hard copy and electronic form. We have implemented controls around technology and our organisation processes to assist us in protecting your personal information. This includes having in place confidentiality requirements from our employees, document storage security policies, systems and site access restrictions and requiring third parties to satisfy identification requirements.

We expect all of our employees and contractors to comply with the *Privacy Act* and our Privacy Policy and will take appropriate actions to address breaches by employees and contractors of the obligations imposed by the *Privacy Act*.

No data transmission over the internet can be guaranteed to be 100% secure. As a result, while we strive to protect users' personal information, we cannot guarantee or warrant the security of any information transmitted to it and users do so at their own risk. Once we receive your information, we make every effort to ensure its security on our systems. If you are concerned about sending your information over the internet, you can contact us by telephone, email or post.

Panoramic will take all reasonable steps to protect the personal information in our possession (be that stored electronically or in hard copy form) from misuse, unauthorised access, loss, modification or disclosure.

8. Privacy queries

If you have a complaint about our privacy practices, any questions about privacy or about the way in which we handles personal information, you may contact the Privacy Officer. Our Privacy Officer can be contacted on the following details:

The Company Secretary
Panoramic Resources Limited
Level 9
553 Hay Street
Perth WA 6000

Telephone: +61 8 6266 8600
Email: info@panres.com

If you make a complaint, we will endeavour to respond to it as soon as possible. If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at enquiries@oaic.gov.au