



RESOURCES

*resourcing the new economy
for a better tomorrow*

PRIVACY POLICY

EQ RESOURCES LIMITED

ABN 77 115 0009 106

eqresources.com.au

1.0 PURPOSE

The aim of this Policy is to:

- set out how EQ Resources Limited and its related bodies corporate collect, use, hold, disclose, protect and manage personal information;
- ensure personal information we hold is processed and managed appropriately and in accordance with our legal obligations, such as those arising under the *Privacy Act 1988 (Cth)* (**Privacy Act**) for Australia, and the *General Data Protection Regulation (EU) 2016/679 (GDPR)* for Spain.
- provide individuals with clear information about the types of personal information EQR collects, the purposes for which it is used, and the circumstances in which it may be disclosed; and
- explain how individuals may access or correct their personal information, exercise applicable privacy rights, or make a privacy complaint.

2.0 SCOPE

This Policy applies to:

- (a) The Board and all EQR employees, contractors, and service providers (**You, you or your**)
- (b) personal information handled by EQR and its subsidiaries in Australia and Spain.
- (c) all personal information relating to individuals including employees, contractors, service providers, shareholders, investors, business contacts, community members, website users and other stakeholders who interact with EQR.

Where the GDPR applies, the relevant EQR Group member Saloro SLU, acts as a data controller unless stated otherwise.

3.0 CONTEXT

EQR is an Australian public company listed on the ASX and operates as a mining and resources infrastructure in Australia and Spain. In the ordinary course of its operations, EQR collects and handles personal information that is reasonably necessary for its business, to maintain commercial relationships, corporate governance, regulatory, safety, employment, operational and stakeholder engagement activities.

EQR recognises that privacy and data protection obligations apply across different jurisdictions.

EQR is committed to taking reasonable and appropriate technical and organisational measures to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

4.0 POLICY

4.1. [WHAT WE COLLECT](#)

EQR will only collect personal information that is reasonably necessary for its business and related activities. This may include:

- name and contact details, including address, email address, phone number, emergency contact details;
- qualification information, information provided during the recruitment process, background checks, right to work information, health information;
- employment, contractor or shareholder information (for identity verification);
- identification and verification information including clearance checks, assessment outcomes, information required to administer the ongoing employment relationship;
- workplace data and interactions with EQR IT resources
- demographic information for diversity and inclusion purposes and health information relevant to your employment with EQR;
- Information provided in connection with whistleblower, ethics, grievance, investigation or compliance reporting processes;
- business and professional details;
- communications with EQR and its service providers (including our share registry);
- website usage information, including cookies and similar technologies to improve functionality and understand usage, where applicable; and
- financial and payment information, such as bank accounts, payroll records, where required.

EQR generally does not collect sensitive information under Australian law or special category data under the GDPR unless required by law or where appropriate safeguards are in place.

EQR's website may use cookies. Where required under EU law, consent mechanisms are provided. Individuals can manage cookie preferences through their browser settings.

4.2. [HOW WE COLLECT](#)

EQR may collect personal information:

- directly from an individual when they interact with EQR;
- through EQR's website, systems or correspondence;
- from third parties such as service providers, background check providers, recruitment agencies, regulators, address validation providers, or professional advisers; and
- from publicly available sources.

If EQR collects personal information from a third party, EQR will take reasonable steps to ensure the individual is aware of this, where required by law.

4.3. [HOW WE USE](#)

EQR uses personal information for its business purposes, that include:

- managing employment, contractor and workplace relationships (including human resources, health and wellbeing support);
- meeting shareholder and corporate governance obligations;
- managing safety, security, risk and compliance activities;
- administering IT systems and communications
- responding to enquiries and complaints; and
- administer ethics, whistleblower, grievance and investigation processes, including investigating alleged misconduct, breaches of law, company policies and other compliance matters.

Where the GDPR applies, EQR processes personal information on one or more lawful bases, including performance of a contract, compliance with a legal obligation (which includes emergency situations, assisting law enforcement agencies), legitimate business interests (such as meeting our employment, equal opportunity and workplace health and safety regularity obligations), or consent where required. Where consent is the lawful basis for processing, the individual may withdraw that consent at any time by using the Privacy Enquires and Complaints section below.

4.4. [WHO WE DISCLOSE TO](#)

EQR may disclose personal information to:

- related companies within the EQR Group;
- service providers and contractors, including IT, payroll, legal, accounting and professional advisers;
- regulators, government authorities and law enforcement bodies;
- prospective purchasers of our business (where relevant); and
- any other party where required or permitted by law.

EQR requires all third-party service providers to handle personal information securely and in accordance with applicable privacy laws.

As EQR operates in Australia and Spain, personal information may be transferred, stored or processed outside the country in which it was originally collected, including within the European Union and Australia. Where personal information is transferred internationally, EQR will take all reasonable steps to ensure appropriate safeguards are in place, including contractual protections, compliance with APP 8 and GDPR Chapter V, and use of approved transfer mechanisms where required. You have the right to request information about the relevant safeguards (Article 46 GDPR)

4.5. [HOW LONG WE RETAIN](#)

EQR retains personal information only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory or governance obligations. EQR takes all reasonable steps

to protect the confidentiality, integrity and availability of personal information in our possession (stored electronically or in hard copy form).

We have implemented controls around our technology and information handling processes to assist us in protecting your personal information. This includes having in place confidentiality requirements from our employees, contractors and third-party service providers, document storage security policies, utilising secure systems for data storage and transmission, implementing site access restrictions and requiring third parties to satisfy identification requirements.

Our document retention and disposal procedures extend to records that include personal information. When personal information is no longer required, EQR will take reasonable steps to securely destroy it or permanently de-identify it.

4.6. [RESPONDING TO DATA BREACHES](#)

EQR has processes to respond to data breaches. Where required by law, EQR will notify affected individuals, the Office of the Australian Information Commissioner in Australia, and the Spanish Data Protection Authority (AEPD) or other relevant EU regulators. GDPR-reportable breaches will be notified within 72 hours where applicable.

4.7. [RIGHTS OF INDIVIDUALS](#)

Individuals may have rights under applicable privacy laws. In Australia, individuals may request access to personal information held about them and request correction of inaccurate or outdated information.

Where the GDPR applies, individuals also have rights to:

Right	Primary Article	Core Content
Right to be informed	Articles 13 and 14	Receive privacy information at the point of data collection
Right of access	Article 15	Obtain confirmation on how your personal information is processed and a copy of personal data held
Right to rectification	Article 16	Have inaccurate or incomplete data corrected
Right to erasure	Article 17	Request deletion of personal data if you withdraw your consent and there is no other legal basis to continue processing the information
Right to restriction of processing	Article 18	Limit use of data without deleting it
Right to data portability	Article 20	Receive your data in a structured, machine-readable format
Right to object	Article 21	Challenge processing of your personal data based on legitimate interests
Rights related to automated decision-making	Article 22	Challenge decisions made solely by automated systems

4.8. PRIVACY QUERIES AND COMPLAINTS

Privacy enquiries, access or correction requests, and complaints should be directed to:

Contact	Privacy Officer
Company	EQ Resources Limited
Email	companysecretary@eqresources.com.au OR https://www.eqresources.com.au/site/contact/contact-us

EQR will investigate privacy complaints and respond within a reasonable timeframe. Individuals may also lodge a complaint with the Office of the Australian Information Commissioner, the Agencia Española de Protección de Datos (AEPD), or their local EU supervisory authority, as applicable, by following the instructions on their respective websites.

5.0 **NON-COMPLIANCE**

Any actual, suspected or inadvertent breach of this Policy, or any actual or suspected data breach involving personal information, must be reported immediately to the Privacy Officer, the Company Secretary or the relevant line manager.

Failure to comply with this Policy may result in disciplinary action, up to and including termination of employment or engagement. Non-compliance may also result in legal, regulatory, reputational, operational or financial consequences for EQR and/or the individual involved.

6.0 **MANAGEMENT OF POLICY**

EQR has nominated the Company Secretary as the person with primary responsibility for compliance with this Policy and making employees, contractors and relevant service providers aware of this Policy. Any questions about this Policy should be referred to the Company Secretary or Privacy Officer.

This Policy will be reviewed by the Board every 2 years to ensure it remains effective and meets applicable legal requirements, best practices, industry standards and EQR's needs.

This Policy will be available on EQR's website within a reasonable time after any updates or amendments have been approved.

This Policy cannot be amended without written approval from the Board of Directors.

7.0 **DOCUMENT VERSION INFORMATION**

Code Status:	Adoption	26 August 2026
	Version	V1.0 original 12 March 2014 V2.0 Updated on 26 August 2026
Endorsement Body:	EQ Resources Board	
Approval Body:	EQ Resources Board	
Maintained by:	Company Secretary	
Review	2 years	