

Privacy Policy

BRAZILIAN RARE EARTHS LIMITED

ACN 649 154 870

(Approved by the board of directors on 13 February 2023)

1. Purpose

- (a) Brazilian Rare Earths Limited and its subsidiaries (BRE) are committed to respecting the privacy of your personal information. This Policy summarises our personal information management practices.
- (b) BRE is committed to respecting the privacy of your personal information. BRE will comply with applicable privacy laws such as the Australian Privacy Act 1988 (Cth) and the Australian Privacy Principles, in relation to the management of personal information. This Privacy Policy sets out how BRE collects, holds, uses and discloses your personal information.
- (c) By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

2. Employment information exempt from Privacy Act

- (a) This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are outside the scope of the privacy laws.
- (b) When you apply for a role with BRE, certain information may be collected from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to BRE to assist in deciding whether or not BRE will make you an offer of employment or engage you under a contract.

3. What personal information is collected?

- (a) Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details.
- (b) BRE may collect the following types of personal information:
 - i. name;
 - ii. mailing or street address;
 - iii. email address;
 - iv. telephone number and other contact details;
 - v. bank account details;
 - vi. your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
 - vii. details of your enquiry, including any additional information necessary to respond to your enquiries;
 - viii. any additional information relating to you that you provide to BRE directly or indirectly through your use of BRE's website;
 - ix. information you provide to BRE when you communicate with BRE by email, telephone or other means; or
 - x. any other personal information that may be required in order to facilitate your dealings with BRE.

4. What about sensitive information?

- (a) Sensitive information includes information about a person's racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, trade-union membership, health or medical conditions, genetic or biometric information, sexual orientation or criminal convictions and offences.
- (b) BRE will not collect, use or disclose sensitive information about you unless it is necessary to provide you with a product or service and we have your consent, or unless we are legally required to collect, use or disclose that information.

5. How is personal information collected?

- (a) Where possible, BRE will try to collect information from you directly rather than from another person or source, unless it is unreasonable or impracticable to do so.
- (b) The choice of how much information you provide BRE is yours. Where possible, you have the option of interacting with BRE anonymously or using a pseudonym if you feel more comfortable dealing with BRE that way. For example, if you contact BRE by telephone with a general question, BRE will not ask for your full name unless it is needed to answer your question.
- (c) BRE may monitor emails sent to and from its workforce, which may contain personal information relating to third parties. The information contained in such emails may be used for business-related purposes, for example when investigating incidents within BRE. Although BRE endeavours not to review the contents of personal emails, there may be occasions where this is necessary, for example, to investigate a breach of security within BRE, or in the context of legal proceedings.

6. How is your personal information used?

- (a) BRE may collect, hold, use and disclose your personal information for the following purposes (**Purpose**):
 - i. to communicate with you, including answering your questions and providing you with information;
 - ii. provide your information to third parties that assist BRE in providing the services you have requested;
 - iii. carry out administration, marketing, fraud and loss prevention activities;
 - iv. to consider and respond to complaints made by you;
 - v. to comply with laws or regulations or to comply with any directions given by governmental regulators or authorities;
 - vi. to enable you to access and use the BRE website;
 - vii. to operate, protect, improve and optimise the BRE website and users' experience, such as to perform analytics, conduct research and for marketing;
 - viii. to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
 - ix. to send you news, announcements and other information that may be of interest to you; and
 - x. to consider your employment application.

7. Disclosure of personal information

- (a) Your personal information may be disclosed in connection with any Purpose to any of the following:
 - i. BRE employees and related bodies corporate;
 - ii. third party suppliers and service providers (including providers for the operation of our websites and/or our business);
 - iii. professional advisers, dealers and agents;

- iv. payment systems operators;
- v. our existing or potential agents, business partners or partners;
- vi. anyone to whom our assets or businesses (or any part of them) are transferred;
- vii. specific third parties authorised by you to receive information held by BRE; and/or
- viii. other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

(b) BRE may also disclose your personal information if:

- i. you have consented to the disclosure; or
- ii. where disclosure is necessary to prevent injury to life or health; or
- iii. it is required or authorised by or under an Australian law or a court/tribunal order.

(c) As BRE operates globally, we may share the personal information you submit to us with any entity within the BRE group worldwide. These entities are required to maintain the confidentiality of this information and are restricted from using it for any purpose other than the purposes set out in this Privacy Policy.

8. Accessing and correcting personal information

(a) You may request access to your personal information collected by BRE, and ask that BRE corrects that personal information. You can ask for access or correction by contacting BRE's Privacy Officer and you should receive a response within 30 days. If BRE refuses to give you access to, or correct, your personal information, BRE will notify you in writing setting out the reasons.

9. Unsubscribing from email subscriptions

(a) From time to time BRE may send you news and announcements electronically. You may unsubscribe from BRE's mailing list at any time by scrolling to the bottom of our email and clicking "Unsubscribe".

10. Security of your personal information

(a) To ensure that all information collected will be safely and securely stored, BRE protects your personal information by maintaining your personal information in a secure environment which can be accessed only by authorised personnel. However, no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure.

(b) In addition, BRE will take reasonable steps to destroy or de-identify personal information once it is no longer needed for our record retention purposes.

11. Notifiable data breaches

(a) In the event of any unauthorised access or unauthorised disclosure or loss of your personal information that is likely to result in serious harm to you, BRE will investigate and notify you and the appropriate regulatory body in accordance with privacy laws.

12. Making a complaint about breaches of privacy

(a) If you believe your privacy has been breached by BRE, or if you wish to make a complaint about the way BRE has handled your personal information, you can contact BRE's Privacy Officer using the contact details set out below.

(b) Please include your name, email address and/or telephone number and clearly describe your complaint. BRE will acknowledge your complaint and respond to your complaint within a reasonable period of time (usually within 30 days). If you are not satisfied with BRE's

response to your complaint, BRE will provide you with information about the further steps you can take.

13. How to contact us

- (a) For further information about this Privacy Policy or related practices, or to access or correct your personal information, or make a complaint, please email stephenk@kcgadvisors.com.au or contact:

*Company Secretary
Brazilian Rare Earths Limited
PO Box 5807 Brisbane QLD 4000*

14. Review

- (a) BRE may change this Privacy Policy from time to time. You are encouraged to check back periodically to ensure that you are aware of BRE's current Privacy Policy.