
Energy Developments Limited
(“Company”)
A.C.N. 053 410 263

PRIVACY POLICY

Energy Developments Limited ABN 84 053 410 263 and its Australian subsidiaries (collectively “EDL”) is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012). This privacy policy explains how EDL treats personal information which it collects about individuals. It also details the types of information EDL collects in the ordinary course of its business, how EDL may use that information and who EDL allows to access that information.

From time to time EDL may make changes to this policy or may provide individuals with additional specific advice about how it uses particular information collected from them.

Personal information collected by EDL

General

In its normal business operations, EDL does not supply products or services directly to individuals, but rather to corporations. Also, in the main, it acquires goods and services from corporations rather than from individuals.

Accordingly, EDL does not ordinarily collect, store, use or disclose personal information about its customers or suppliers in the normal course of conducting its business. However, some limited personal information (see below) is collected about directors and managers of customers and suppliers and also about suppliers who are individuals.

EDL recognises its obligation under the Australian Privacy Principles to maintain a privacy policy which is available to those that request it and to abide by that policy and the Australian Privacy Principles in respect of any personal information it collects, stores, uses or discloses.

EDL collects information which is needed by it to provide its products or services only. EDL will usually collect that information directly from the individual, unless it is not reasonable or practicable to do so, or the individual has consented to EDL obtaining the information from someone else (eg referees for employment applicants).

Individuals are not compelled to give EDL any personal information about them or about another person which may be requested of them, but this may affect EDL’s ability to supply its products or services or manage its operations (including employing new staff or keeping its securities registers).

(i) Customers & Suppliers

The types of personal information EDL may collect from its customers and suppliers may include the following:

- name and address and other contact information;
- in the case of suppliers, financial details such as credit reports; and
- transaction information relating to products or services supplied by or to EDL.

For the purposes of this privacy policy, these types of personal information will be referred to collectively as **Business Information**.

(ii) Human Resources

EDL notes that there is an exemption from the Australian Privacy Principles for employee records. However, from time to time EDL may collect personal information about employment applicants which does not fall within the exemption.

This information may include:

- name and address and other contact information;
- records of former employment;
- name and address and other contact information about and opinions held by referees; and
- academic and education records.

For the purposes of this privacy policy, this information will be referred to collectively as **Human Resources Information**.

(iii) Registers of Securities

As required by the Corporations Act 2001 (Cth) and its constitution, EDL maintains registers of its members, and option holders. Accordingly, EDL collects personal information about its members, and option holders which may include:

- name and address and other contact information; and
- details of shares and options held in relation to EDL and entitlements derived from them (eg. dividends).

For the purposes of this privacy policy, this information will be referred to collectively as **Registry Information**.

Use and disclosure of personal information by EDL**Use**

EDL uses Business Information, Human Resources Information and Registry Information to:

- administer and manage the supply of its products or services;
- facilitate its internal business operations, including recruiting personnel;
- market its products and services and select reliable suppliers; and
- comply with any regulatory or legal requirements.

Disclosure

EDL may disclose Business Information, Human Resources Information and Registry Information:

- to its agents, consultants, auditors, contractors, contract staff or third party service providers that provide administrative, financial, registry or other services in connection with the operation of its business;
- to its related local and overseas related bodies corporate who share access to its internal databases and records (as is necessary only);
- to archiving and document handling contractors;

- to government agencies, including the Australian Taxation Office and the Australian Securities & Investments Commission, as part of its regulatory or statutory compliance; and
- where the law requires or permits EDL to do so (eg to persons seeking access to or copies of securities registers and to law enforcement agencies) or if the individual consents.

EDL will bring to the attention of persons who request Register Information the restrictions applying to the use and disclosure of that information under section 177 of the Corporations Act 2001 (Cth).

Access and correction

EDL will promptly inform an individual on request, of any personal information held by EDL about that individual and provide access to or copies of the information within a reasonable time. There is no fee for requesting access to information, however EDL may charge you the reasonable cost associated with processing a request.

An individual may ask EDL at any time to correct personal information which EDL holds about that individual, where the individual believes the information is incorrect or out of date.

EDL seeks to ensure that all information it holds about individuals, which it collects, uses, stores or discloses, is accurate, complete and up to date. However, individuals should promptly notify EDL if there are any changes to their personal information.

Information security

EDL takes all reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure.

Personal information (other than contact details) is stored securely whether in electronic or physical form. For example, only staff needing access to the information are permitted access. Human Resources Information is stored in secure premises or in electronic databases requiring logins and passwords.

Once the purpose for which personal information is achieved (eg EDL places a purchase order with the relevant supplier):

- (a) EDL will archive the record which holds the information in a secure manner for a maximum period of 7 years from the conclusion of the matter if EDL reasonably contemplates that it may need to retrieve or review that information for a legitimate business purpose; or
- (b) otherwise, EDL will keep the record which holds the information for a maximum period of 12 months and then destroy the information in a secure manner (eg by document shredder).

Individuals should bear this archiving procedure in mind when submitting an access request.