

Privacy Policy

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1. OUR APPROACH TO PRIVACY

This policy describes how we collect, use, store and disclose your personal information in accordance with the Privacy Act 1988 (Cth) (*Privacy Act*).

In this policy, when we say:

- **we, our or us** – we mean Liontown Limited (ABN 39 118 153 825) and our related companies within the Liontown Group.
- **you** – we mean you, the reader of this policy.

The Privacy Act contains certain exemptions and permitted general situations in relation to certain acts undertaken, including in relation to employee records, legal claims and litigation and related bodies corporate. Where appropriate, we make use of relevant exemptions in the Privacy Act.

We may modify this policy from time to time by publishing updates on our website. We encourage you to check our website periodically to ensure you are aware of our current privacy policy. We may also update individuals about how their personal information is collected and handled over the course of our relationship with those individuals.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal information includes information or an opinion (whether true or not) about an identified or a reasonably identifiable individual.

The table below identifies the types of personal information that we may collect and hold about you.

Type of personal information	Examples (non-exhaustive)
Personal and contact details	This may include your name, gender, job title, photograph, address, age or date of birth, postcode, phone number, email address, marital status and employment details.
Payment information	This may include your credit card or bank account details.
Information we collect about your interactions with us, including digital and/or behavioural information	This may include: <ul style="list-style-type: none"> • information regarding the purpose and times of your visit to our sites or premises; • telephone and video/CCTV recordings and photographs; • information to identify the devices and IP addresses and ISPs you use to access our website or online services and other information we collect when you use our websites or apps (eg such as server log and location information); • information that we generate about how you use our products and services and online platforms; and • information we collect when you make an enquiry, complaint or raise concerns, or when you provide feedback or survey responses.
Government issued identifiers and identification documents	This may include: <ul style="list-style-type: none"> • tax file number, Medicare card, passport, driver licence • citizenship, birth, death and marriage certificates • or any other local or foreign government issued identity documents.
Sensitive information	This may include: <ul style="list-style-type: none"> • pre-work health screening checks; • any health information (including medical conditions and genetic information) you provide when accessing our sites or which is relevant to a safety incident that occurs on one of our sites or in the course of your employment or contract with us;



Type of personal information	Examples (non-exhaustive)
	<ul style="list-style-type: none"> • biometric information (such as fingerprints or face), where this information is collected and used for the purposes of biometric verification or biometric identification; and • criminal history, racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, and any trade union membership which may be collected during the recruitment process, in the course of your employment with, in connection with the provision of contracted services to us, or as otherwise relevant to our relationship or engagement with you.
If you apply for a role with us, information relevant to your potential working relationship	Your qualifications, work history, types of roles you are interested in, resume, interview notes, reference and background check information (including criminal records checks), results of any psychometric tests, identity verification information, payroll information, information about your right to work in Australia (such as your work visa) and union information.
If you are a current or former employee, contractor, or office holder, other information as necessary and relevant to your employment (or engagement)	Emergency contact details, information about remuneration and benefits, and information about your performance, training and development.
If you are a supplier, or if you visit or access our physical sites, information about our engagement or your visit	<p>This may include:</p> <ul style="list-style-type: none"> • information regarding the purpose and times of your visitation at our sites or premises; and • information we may require to onboard you to our systems and processes and/or provide you with access to our sites or premises.
If you are a shareholder, information relevant and as may be required by our share registry	<p>This may include:</p> <ul style="list-style-type: none"> • identity and contact information including your name and address; • Securityholder Reference Number (SRN) or Holder Identification Number (HIN) • information about your relationships to other people; • financial and transactional information which includes your bank account details and tax file number (TFN); and • marketing and communication preferences.
Other personal information made available to us from time to time	Information you voluntarily provide to us, including complaints or concerns raised by you or any feedback or survey responses.

3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We generally collect your personal information directly from you, for example when you:

- enquire about, apply for, or use our products or services;
- communicate with us through any means (eg in person, or via email, chats or social media platforms); or
- interact with our websites, app, services, content or our marketing and promotional activities.

In some circumstances we may collect your information from third parties (eg our related companies, third party service providers and other organisations that we partner with). This may include:



Type of person	Further detail (non-exhaustive)
Your representatives	Any persons you have appointed as your representatives, such as your legal adviser, guardian or those holding your power of attorney.
Verifiers	Third parties that assist in verifying information about you, including: <ul style="list-style-type: none"> • your doctor, to verify your medical history and/or fitness to work; • your current or former employer, to verify your employment status or identity, or previous performance; and • other third parties (recruiters, previous employers, referees and CV checking agencies) that we may use to conduct background and ID checks and/or who can assist us in our assessment of your suitability for a role.
Publicly available sources	Including from: <ul style="list-style-type: none"> • online forums, websites, Meta, LinkedIn, X, YouTube or other social media (eg if you use social media to make a complaint); and • public registers (eg registers held by ASIC or Land Registry Services).
Recruiters, previous employers, referees and CV checking agencies	When you apply for a job or position with us, we may collect information about you from relevant third parties who can assist us in our assessment of your suitability for a role.
Other service providers and/or third parties	External companies who assist us in carrying out our business.

4. WHY DO WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION?

In general, we use your personal information to enable us to conduct our business. We may use or disclose your personal information where we are permitted to do so under applicable laws, and/or where we have received your consent. This may include:

Purpose	How we may use your personal information
Engage with you as a customer or customer representative	To provide you with, and manage the products and services you or your business purchase or obtain from us, including to communicate with you and provide you with other administrative related information.
Engage with you as a contractor / service provider	To engage with you in connection with products or services provided to us, including to enable access and use of our systems and facilities, communicate with you and provide you with other administrative related information.
Manage our operations and improve our business	To: <ul style="list-style-type: none"> • deliver our products and services; • make and manage payments; • maintain relationships with our employees, contractors, customers, supplier, and other stakeholders; • respond to incidents, complaints, or grievances; • undertake website administration and internal operations; • manage our share register, security holder records, and shareholder relationships, including for the purposes of undertaking share transactions, dividend payments and communications with shareholders;



Purpose	How we may use your personal information
	<ul style="list-style-type: none"> record / monitor demographics, comply with Australian participation obligations; and conduct marketing and research activities.
Comply with legal obligations	To comply with laws and assist government or law enforcement agencies where we are required or authorised to do so.
Manage security and risk	To manage our security and risks, such as: <ul style="list-style-type: none"> managing and monitoring access to and use of physical properties to ensure the safety of our people, suppliers and others; investigate health and safety incidents; and supporting the management of our information security and network procedures (including monitoring electronic communications) to prevent, investigate and respond to attempted and actual cyber-attacks, unauthorised access and other criminal or malicious activities.
Sales or acquisitions	To support any changes to the ownership of assets or our business, such as in connection with actual or potential divestments, acquisitions, restructures, investments or sales.
Engage with our related companies	We may share your personal information with our related companies in the course of running our business and managing and enforcing our contracting arrangements (including where those entities may support our business functions).
Information collected for recruitment or employment purposes	If individuals apply for a role or position with us, to determine whether to make an offer of employment or engage individuals under a contract including to contact individuals when we may need to tell them something important about the prospective employment/engagement or request for additional information.
Direct marketing	<p>From time to time, we may also use or disclose your personal information to tell you about offerings, products and services we think may be of interest to you, but we will stop if you ask us to. You can opt out of receiving marketing material from us by emailing info@liontown.com.</p> <p>We may contact you by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising.</p>
Other purposes	We may also use individual personal information for any other purposes identified at the time of collecting personal information, for any other purposes for which you have provided your consent, or if there is another lawful basis for doing so.

5. WHO DO WE SHARE YOUR INFORMATION WITH?

We may share your personal information with the parties identified in the table below.

Type of party	Description
Our related companies	Includes the subsidiaries of Liontown at any time, as listed periodically in our annual report.
Third party suppliers	This may include: <ul style="list-style-type: none"> auditors, lawyers, accountants, consultants, insurers and re-insurers; service providers that assist us to identify, investigate or prevent fraud or other misconduct; organisations that we partner with to provide services and products;



Type of party	Description
	<ul style="list-style-type: none"> providers of data related services; and our share registry provider.
Verifiers	Third parties that assist in verifying information about you, including: <ul style="list-style-type: none"> your doctor, to verify your medical history and/or fitness to work; your employer, to verify your employment status or performance; or other third parties (recruiters, previous employers, referees and CV checking agencies) that we may use to conduct background and ID checks and/or who can assist us in our assessment of your suitability for a role.
Authorised third parties	This includes: <ul style="list-style-type: none"> third parties authorised to act for you (eg your agents and representatives, legal representatives, financial advisors or people with a power of attorney); or third parties authorised to receive information held by us, such as your employer or a referee.
Government agencies, law enforcement and regulators	This includes government agencies, regulatory bodies, law enforcement agencies, or any other person as required, authorised or permitted by law.
Persons with an interest in our business	Anyone to whom our assets, businesses or securities (or any part of them or an interest in them) are or may be transferred (including their advisers and representatives).

6. OFFSHORE DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your personal information to recipients outside of Australia for the purposes referred to in this policy, including but not limited to the Philippines, Malaysia, and India.

7. USING OUR WEBSITE, ELECTRONIC MESSAGES AND COOKIES

We may collect and store information about your use of our website. The data collected is used for legitimate purposes such as performance, understanding users interactions, lead measurement and website security.

We and our Internet Service Provider (ISP) collect information such as session information, the pages you access on our website, the documents you download, the amount of time you spend on a page or viewing a webinar, which links you use to access our site, the type of device and browser you use, approximate geographic location and IP address. This information is used to improve the services we offer you and for statistical, security, website development and functionality purposes.

Data collected through form submissions and security tools may be collected and stored on the website's server infrastructure through specific plugins.

Most internet browsers are set up to accept cookies. If you do not wish to enable cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer.

If you click through to our website from any newsletter, invitation, update or other email or message we send to you, we may identify and collect information relating to your subsequent and previous use of our website, such as which pages you visit and for how long.

We will hold that information and, subject to your communication preferences, we may contact you in relation to those insights or service areas. If you do not want to receive marketing emails from us, you can opt out at any time by sending a request via the Contact form available on our website or by emailing info@liontown.com.

8. HOW DO WE STORE AND KEEP YOUR INFORMATION SECURE?

We hold your personal information in both electronic or hard-copy form. We use a variety of physical and electronic security measures to keep your personal information secure from misuse, interference, loss or unauthorised access,



use or disclosure. For example, we restrict physical access to our servers, employ firewalls, secure databases, password protect our IT systems, use anti-virus software, multi-factor authentication and use cyber security services.

However, we cannot guarantee the security of your personal information. The internet is not a secure environment. If you do use the internet to send us any information, including your email address, please be aware that it will be sent at your own risk.

Our websites and electronic communications may contain links to other websites operated by third parties. Unless expressly stated otherwise, we are not responsible for the privacy practices or the content of those linked websites. The privacy policies that apply to those other websites may differ from our privacy policy, so we encourage individuals to read them before using those websites.

9. ACCESSING OR CORRECTING YOUR PERSONAL INFORMATION

You have rights under the Privacy Act and *Spam Act 2003* (Cth) to (as applicable):

- request access to personal information we hold about you;
- ask us to update or correct any information that is inaccurate, incomplete or outdated; and
- opt out of receiving direct marketing communications from us.

If you wish to access, correct or update any personal information that we hold about you, please send a request via the Contact form available on our website. We try to make your information available within 30 days after you ask us for it.

If you request access to your personal information or ask us to correct or update information about you, we may need to verify your identity. In some circumstances, there may be a valid reason for us to deny your request to access or correct your information. If we do this, we will tell you why.

10. MAKING A COMPLAINT

If you think we have breached the Privacy Act, or are not happy with our response or how we handled your query (including our response to your request to access or correct your personal information) or how we have handled your personal information, you can contact us via the Contact form available on our website.

If you are not satisfied with the outcome of any internal investigation we conduct, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) at enquiries@oaic.gov.au or on 1300 363 992. More information is available on the OAIC's website at <https://www.oaic.gov.au/>.

11. ROLES AND RESPONSIBILITIES

Roles	Responsibilities
Chief Executive Officer	Accountable to the Board of Directors for ensuring that this Privacy Statement is implemented throughout Liontown operations
Liontown Legal & Compliance	Responsible for the management and implementation of this Privacy Policy.

For and on behalf of the Board of Directors

Tony Ottaviano
CEO & Managing Director

12. REVIEW OF THIS POLICY

The Board is responsible for reviewing this Policy annually. This Policy may be amended by resolution of the Board.

Policy Ref.	Policy Name	Ver	Author	Approving Authority	Approved Date
POL-CP-C.000-0016 (Previously P-16)	Privacy Policy	1	Business Systems Manager	Board of Directors	





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