



PRIVACY POLICY


COMPLIANCE

DRA Global

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APPROVALS

Description	Name	Title	Signature	Date
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1 YOUR PRIVACY IS IMPORTANT TO US

DRA Global is strongly committed to protecting personal data and we recognise the importance of protecting the privacy of personal data we collect about you.

This Privacy Policy applies to personal data provided to us, by individuals themselves, by others or through the <https://www.draglobal.com> website to promote and undertake the DRA Global business and its services (hereinafter referred to as the "Service") for the benefit of DRA Global Limited registration number ACN 622 581 935, and its subsidiaries, associates and joint ventures) ("us", "we", or "our").

We may use personal data provided to us for any of the purposes described in this Privacy Policy or as otherwise stated at the point of collection.

This policy explains how we collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combine, restrict, erase or destroy your personal data under applicable privacy laws. We use your personal data to provide and improve the Service.

DRA Global applies the *General Data Protection Regulation* ((EU) 2016/679 (GDPR) as its primary privacy law regime. We also recognise that other privacy laws may apply to the collection, handling and processing of personal data and exercise of privacy rights, such as the *Protection of Personal Information Act 4 of 2013 (South Africa)*, the *Privacy Act 1988 (Cth) (Commonwealth of Australia)* and to the extent of any conflict between any of those, we will apply the more stringent legal requirements.

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and will update the "effective date" at the bottom of this Privacy Policy. You are advised to review this Privacy Policy periodically so that you are updated on any changes. Changes to this Privacy Policy are effective when they are posted on our website.

2 COLLECTING AND USING YOUR PERSONAL DATA

We collect your personal data either directly from yourself or from our business or related entities and affiliates located in different countries (e.g., Canada, South Africa, United States of America, China, United Kingdom etc.) when you:

- Contact us;
- Use our Services;
- Visit our website; or
- Deal with us in some other way.

We collect several different types of information for various purposes to provide and improve our Service to you. We only collect and use personal data that is directly related to, or reasonably necessary for, our business functions and activities. If you choose not to provide some of your personal data, this may prevent us from providing our Service to you or limit our ability to provide the level of service you would normally expect from us.

We may also collect special categories of personal data ('Sensitive Data') from you. However, we will only collect this type of information if you have provided us with your explicit consent and/or the information is required for us to fulfil our legal obligations (for example, if you apply for a job with us or are a current employee). Sensitive Data may include information relating to:

- Racial or ethnic origin;
- Trade union membership;
- Health;
- Genetic or biometric information;
- Criminal record;
- Passport biodata;
- Financial and credit checks;
- Police clearances.

We may also collect your personal data from other parties, such as:

- Recruitment companies;
- Labour brokers;
- Background and Security clearance checks;
- Previous employers (reference checks);
- LinkedIn recruiter;
- Provident / Retirement fund administrators;
- Medical aid / insurance administrators.

We may also collect information about how the Service is accessed and used by you ("Usage Data"). This may include information such as your computer's internet protocol address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

2.1 How and why your personal data is used

We collect your personal data for different purposes, which is dependent on what your interaction is with us.

The DRA Group ensures that personal data can only be collected and used for a specified, explicit and legitimate purpose and that personal data is not processed further in a way that is incompatible with the purpose for which it was originally collected. Collected personal data cannot be used for a new, different or incompatible purpose from that disclosed when the personal data was originally collected without first informing the individual of the changed purpose and having obtained consent where required. We use your personal data to:

- Where relating to our Website -
 - Provide and maintain our website and internal operations, including monitoring the usage of our website, detecting, preventing, and addressing technical issues (e.g., including troubleshooting, data analysis, testing, research, statistical and survey purposes);
 - Notify you about changes to our website;
 - Allow you to participate in interactive features on our website when you choose to do so;
 - Gather analysis or valuable information so that we can improve our website experience and fulfil marketing and public relation purposes – this includes analysing the characteristics of visitors to our website; to prepare analytics and profiling for business intelligence purposes; to personalise your experience on our website; managing our newsletters and communications and, where DRA Global collects details in the membership database relevant to our e-Business website, for demographic analysis and personalisation of the website.
- Provide support:
 - To our clients, employees, contractors, investors, and persons and entities interested in purchasing or investing in us, or purchasing any of our assets of business; and
 - To local, state and Federal government departments, union officials, and interested members of the community.
- **Manage our relationship with you** – this includes providing you with information or services, improving our Service and communicating with you;
- **Fulfil business-related purposes** – this includes negotiating, managing, and fulfilling our contracts with customers, suppliers and third parties (including e-commerce transactions); managing business relationships; administering real estate leases and licences; managing accounts and records; resource planning, workforce and work site management; activities and operations; internal investigations and due diligence; and debt administration;
- **Satisfy recruitment-related objectives** – this includes considering you for career opportunities (including internship positions) with the DRA Group and inviting you to participate in recruitment activities and events;

- **Manage safety and security risks** – this includes managing and monitoring access and use of our premises and sites, safety and security at our sites (including through the use of CCTV), and our IT environment (including monitoring electronic communications);
- **Manage shareholder relationships** – this includes for the purposes of undertaking share transactions, dividend payments and communications with shareholders; and
- **Meet legal obligations** – this includes meeting obligations imposed under law and under contract; responding to lawful requests from governments, public authorities and contractual parties; and responding to potential or actual litigation.

3 KEEPING YOUR PERSONAL DATA

We will:

- Keep and use your personal data so long as it is necessary for us to comply with our business requirements and legal obligations, resolve disputes and enforce our legal agreements and policies; and
- Take reasonable steps to securely destroy or de-identify your personal data when we no longer need it for a reason, including for legal or business purposes. For example, we keep Usage Data for the business purpose of conducting internal analysis.

4 SHARING YOUR PERSONAL DATA

We may share your personal data with other individuals or entities. This may include:

- Any member of our corporate group, which means related entities that form part of our corporate group (including overseas entities) as well as licensees or agents of our corporate group;
- Our business partners (including our joint venture partners and service providers);
- Third party service providers that provide us with communication (e-mail) or data storage services;
- Technology services including application, development and technical support, processing, storing, hosting and data analysis;
- Professional advisers (such as lawyers, accountants, or auditors) to the extent that is reasonably required;
- Administrative services, including mailing services, printing, archival and contract management services;
- Third party agents or contractors with whom we contract in the ordinary course of business;
- One or more third parties in the event that we go through a business transition, such as a merger, being acquired by another company, or selling all or part of our business or assets;
- Government, regulatory and law enforcement agencies if required to:
 - Comply with a legal obligation;
 - Protect and defend the rights or property of DRA Global Limited;
 - Prevent or investigate possible wrongdoing in connection with the Service;
 - Protect the personal safety of users of the Service or the public; and/or
 - Protect against legal liability.

Sometimes, we may share your personal data overseas to:

- Banks, and financial institutions;
- Professional advisers (such as lawyers, accountants or auditors);
- Cloud service providers or third parties who store personal data or operate outside of Australia, auditors;
- Labour brokers;
- Law enforcement and/or government agencies/ regulators;
- Payroll services.

Where your personal data is shared overseas, it will potentially be shared to one or more of the following countries:

- All countries where DRA and its related bodies corporate have offices (America, Canada, Chile, Peru, Australia, South Africa, Namibia, Zimbabwe, Ghana, Saudi Arabia, Russia, China);
- Cloud services in the European Economic Area;
- Countries, where the aforementioned individuals or entities have offices and where such individuals or entities make use of technology services.

We require the above parties to assume and apply the same rights and obligations regarding your personal data as described in this Privacy Policy.

5 TRANSFER AND RETENTION OF YOUR PERSONAL DATA

Your personal data may be transferred to computers located outside of your state, province, country, or other governmental jurisdiction where the data protection and privacy laws may differ from those of your jurisdiction, for the purposes of storage and/or maintenance.

If you are located outside Australia and choose to provide your personal data to us, please note that we transfer the information to Australia and process it there.

6 SECURING YOUR PERSONAL DATA

We store your personal data in different ways, both at our own premises and with the assistance of our service providers. These ways may include:

- Physical (paper) form;
- Storage through an electronic records system; and
- Data management software or systems in accordance with our usual business practices.

The security of your personal data is important to us. We take all reasonable measures (including both technical and organisational measures) to ensure that your personal data is stored safely to protect it from unauthorised or unlawful processing and against accidental loss, destruction or damage. For example, we have or do:

- Firewalls, advanced IT security measures and physical security measures to prevent interference or unauthorized access to personal data;
- Cryptographic technologies for data confidentiality;
- Identity and access control mechanisms to permit only authorized access to your personal data;
- Training on security and data privacy protection and handling of personal data for employees;
- Several privacy and information security policies and other due diligence mechanisms;
- Monitoring and reviewing compliance to industry best practice and internal policies;
- Security policies binding on employees and third parties and other due diligence mechanisms (e.g., contractual clauses, security assessments).

Our Service is professionally hosted and operated in a secure environment.

7 YOUR INDIVIDUAL RIGHTS TO YOUR PERSONAL DATA

Under certain circumstances, you have the following rights to your personal data:

- **The right to access, update or delete the information we have on you.** You can access, update or request deletion of your personal data (subject to applicable exceptions at law e.g. employee records). If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object to processing.** You have the right to object to our processing of your personal data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal data.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable, and commonly used format. You have the right to request that your data is put into a form that is generally understandable.

- **The right not to be subject to automated processing.** We do not currently undertake automated processing. However, should we carry out this type of activity in the future, you have the right to not be subject to a decision which results in legal consequences, or which affects you to a substantial degree, which is based solely on the basis of the automated processing of your personal data of you including your performance at work, your credit worthiness, reliability, location, health, personal preferences or conduct.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where DRA Global Limited relied on your consent to process your personal data.
- **The right to lodge a complaint.** You have the right to lodge a complaint and report your concerns in writing either to us, or to a privacy or data protection authority, such as the Office of the Australian Information Commissioner. Links to the relevant authority based on your country of residence are provided below.

Country	Document Description
Australia	Office of the Australian Information Commissioner (OAIC) Lodge a privacy complaint with us — OAIC
South Africa	Information Regulator (South Africa) Contact Us IRSA (justice.gov.za)
Canada	Office of the Privacy Commissioner of Canada https://www.priv.gc.ca/en/report-a-concern/
EU Member Countries	EU member Data Protection Authorities (DPO) Our Members European Data Protection Board (europa.eu)
Peru	National Authority for the Protection of Personal Data (ANPD) https://www.gob.pe/anpd
Chile	Chilean Transparency Council https://www.consejotransparencia.cl/

We endeavour to respond to any one of your requests within 30 calendar days and may charge you a reasonable fee for providing access to your personal data (right to access), but not for making the request itself. We may decline a request for access to personal data in circumstances described by the relevant data protection laws and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

To make any one of the above requests, contact our Data Privacy Officer/us at:

privacy@draglobal.com or

DRA Global Pty Ltd
Attn: Data Privacy Officer
PO Box 3130
East Perth,
Western Australia 6892

Once your request has been received, we will email you a form that you must complete with further details of your request and we will ask you to verify your identity, before we respond to your request.

8 LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

9 CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personal data from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with personal data, please contact us. If we become aware that we have collected personal data from Children without verification of parental consent, we take steps to remove that information from our servers.

10 CONTACT US

If you have any questions about this Privacy Policy, please contact us at:

privacy@draglobal.com or

DRA Global Pty Ltd

Attn: Data Privacy Officer

PO Box 3130

East Perth,

Western Australia 6892

This Privacy Policy is current as at 15 October 2021.