ARGO INVESTMENTS LIMITED

PRIVACY POLICY

1. Introduction

Argo Investments Limited ACN 007 519 520 (Argo) respects the confidentiality of the personal information provided to us by our shareholders and others.

Argo is bound by the *Privacy Act 1988* (Cth) (Privacy Act), including the Australian Privacy Principles.

This Privacy Policy sets out how Argo collects, holds, uses and discloses personal information.

2. Personal information

"Personal information" means information or opinion about an identified or identifiable individual, whether that information is obtained from the relevant individual or a third party.

The personal information which Argo collects may include:

- *for shareholders* - names, postal addresses, security holdings, tax file numbers, bank account details, email addresses and telephone numbers; and
- *for job applicants or staff* - employment history, educational qualifications, reference checks, payroll information and medical information (where relevant for job).

3. Collection of information

Argo only collects personal information where it is reasonably necessary to do so for the conduct of our business. Collection of personal information will be fair, lawful and non-intrusive.

Argo may collect personal information in the following ways:

- if you provide your information by telephone, post, email, facsimile, or in person;
- if you purchase shares, or require us to provide services to you; and/or
- if you contact us via email or submit your information through our share registry's website.

Argo is required by the *Corporations Act 2001* (Cth) (Corporations Act) to collect and disclose shareholders' personal information to maintain our share registry.

BoardRoom Pty Ltd has been appointed to act as our share registrar. In this role, it collects personal information from our shareholders. BoardRoom has its own privacy policy which is available on its website and can be viewed here. Argo ensures that its service providers have appropriate policies, procedures and systems in place to protect privacy.

If Argo collects personal information about an individual from a third party we will, where appropriate, request that the third party inform the individual concerned that we are holding such information, how we will use and disclose the information, and of his or her rights to gain access to and correct and update it.

Argo will take reasonable steps to ensure that the personal information which we collect, use or disclose is accurate, complete and up to date.

Note for website users – Argo collects information from our website using Google Analytics[1] which is a free service provided by Google for the purposes of providing statistical information such as IP address[2] and its geographic location, pages visited and information downloaded. You cannot be personally identified from this information and it is used only to provide an effective service on our website. Website visitors can opt out of Google Analytics by utilising the opt-out service provided by Google.[3]

4. The purposes for which we collect, hold, use and disclose personal information

In general, Argo will not use or disclose personal information other than for the purposes for which it is collected, for a purpose which the individual concerned would reasonably expect and which is related to the primary purpose, for a purpose authorised by law, or for some other purpose disclosed to or authorised by the relevant individual.

The primary purpose for which personal information is collected from our shareholders is to enable their holdings to be maintained and administered efficiently. By providing us with your personal information, you consent to us collecting, holding, using and disclosing your personal information in connection with one or more of the following:

- maintenance of Argo's share register as required by the Corporations Act;
- distribution of financial results, annual reports, notices of general meetings and other corporate communications to shareholders;
- distribution of dividend payments to shareholders;
- distribution of offers to purchase new Argo shares;
- compliance with legal and regulatory requirements;
- obtaining and responding to shareholder queries;
- communication and distribution of marketing and promotional material to our shareholders; and
- other purposes required or authorised by law.

BoardRoom may disclose personal information to third party contractors which provide administrative or other services on their behalf, as well as those who provide financial services, including facilities for directly crediting dividends.

There may be circumstances in which we are authorised or required by law to use or disclose your personal information. For instance:

- under the Corporations Act, Argo must allow any person to inspect our share registry on request; and
- from time to time Argo may disclose certain personal information to other persons, such as regulatory bodies (including the Australian Securities and Investments Commission and the Australian Taxation Office) and authorised share brokers.

Where appropriate, Argo will instruct third parties to whom an individual's personal information is disclosed to use that information only for the purposes for which it is disclosed.

Argo may disclose personal information to avoid, lessen or prevent a serious emergency or crime.

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[1] Google Analytics is implemented through a cookie which is placed on the visitor's device coupled with code in the webpage which collects visitor's data and relays it to Google's servers for processing

[2] An internet protocol address is a string of numbers which identifies a specific piece of equipment on the internet and is generally assigned by an internet service provider

[3] Google Analytics opt-out: https://tools.google.com/dlpage/gaoptout

Argo may use personal information for certain marketing purposes. You may opt out of receiving marketing and promotional material from us at any time by clicking 'unsubscribe' on an email or by contacting our Privacy Officer.

5. How we hold personal information

Argo holds personal information as either physical records, electronic records on our or BoardRoom's servers and, in some instances, records on other third-party servers.

Argo will take reasonable steps from a technical and organisational perspective to protect the personal information we hold from misuse, interference and loss and also from unauthorised access, modification or disclosure.

Argo will review, on a regular basis, our information security practices to ensure that our ongoing obligations and responsibilities are observed and maintained. Argo has procedures in place to destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

6. Access and correction

You have a right to request access to your personal information and to request its correction if it is out of date or incorrect.

You may request access or correction at any time by sending a written request to BoardRoom or Argo's Privacy Officer. Argo will respond to all requests for access to or correction of personal information within a reasonable time.

Argo will provide access to your personal information except in special circumstances referred to in the Privacy Act, including where disclosure would have an unreasonable impact on the privacy of another individual, the information would reveal a commercially sensitive decision-making process, or we are prevented by law from making disclosure. If Argo is unable to provide you with access to your information, or make the amendments which you have requested, we will provide you with reasons for this decision.

Depending on the nature of the request for information, Argo may require the completion of a personal information request form (including verification of your identity), and we may charge a fee for our service, but we would advise the amount of the fee when responding to the request. Argo will not charge you to correct your personal information that we hold in our records.

7. Cross-border disclosures of information

As at the date of this Privacy Policy, Argo is not likely to disclose personal information to overseas recipients. If we need to disclose personal information about an individual to a recipient outside Australia, we will do so in compliance with the requirements of the Privacy Act. In general, Argo will seek the individual's consent to the disclosure of the information if we believe that the overseas recipient is not subject to, or has not agreed to comply with, privacy obligations equivalent to those which apply to us.

Argo will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

BoardRoom, in the capacity of our share registrar, may disclose personal information to third party contractors located overseas, who have been engaged to provide services to or perform

functions on behalf of it. The countries in which such recipients are likely to be located are specified in BoardRoom's Privacy Policy which is available here.

8. Data breach

In the event of an eligible data breach as defined by the Privacy Act, Argo will notify the Office of the Australian Information Commissioner and the affected individuals as soon as practicable after we become aware there are reasonable grounds to believe that there has been an eligible data breach.

9. Review of this Privacy Policy

This Privacy Policy is reviewed annually and is available on our website, www.argoinvestments.com.au.

10. Further information and complaints

If you require further information or wish to make a complaint, please contact our Privacy Officer:

Privacy Officer
Argo Investments Limited
Level 25, 91 King William Street
Adelaide SA 5000
Telephone: (08) 8210 9500

Email: invest@argoinvestments.com.au

Argo takes privacy issues seriously, and if you are dissatisfied with the manner in which we have handled your personal information, we will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner, see https://www.oaic.gov.au/privacy/privacy-complaints/ for further information.