

1.0 INTRODUCTION

Galaxy Resources Limited recognises the importance of protecting and securing employee information, and is committed to ensuring the privacy and confidentiality of all employee details and personal information and is bound by the Privacy Act 1988 (Cth), which requires the Company to comply with National Privacy Principles (NPP). See Attachment A for NPP summary.

2.0 PURPOSE

The purpose of the policy is to ensure privacy and confidentiality is established and maintained so information pertaining to current and prospective Galaxy Resources Limited employees is protected and secure in accordance with legislative requirements.

3.0 SCOPE

This policy applies to all employees, contractors, consultants, suppliers and representatives of Galaxy Resources Limited. Each person who accesses personal information has a duty to maintain the privacy of that information. All persons must be familiar with and comply with this policy. Employees must only collect, handle, use, disclose and store the information for the agreed purposes only.

4.0 POLICY

Collection of Personal Information

Personal information will only be collected where necessary for the Company to provide its services. Information may be collected in person or writing; via telephone, email, or website. Situations in which Human Resources/Administration may collect personal information include:

- recruitment and selection of staff and contractors;
- engagement of staff and contractors;
- personnel administration;
- when required by law or certain government agencies;
- in connection with suppliers to ensure they are able to provide required services.

Human Resources/Administration may collect personal information via third parties during the course of recruitment and engagement or during current tenure. Third parties may include:

- Recruitment and/or Human Resources service providers;
- health professionals; insurers and insurance brokers;
- nominated referees.

Sensitive Information

Sensitive information about a person must only be collected with their consent. Sensitive information includes information or an opinion about a person's racial or ethnic origin, political opinions, philosophical or religious beliefs or affiliations, membership of a political, trade or professional association or union, sexual preferences or practices, criminal record or health information.

Disclosure of Personal Information

Where necessary to perform its function, Human Resources/Administration may disclose employee's personal information to third parties including, but not limited to:

- service providers;
- nominated referees;
- health professionals;
- worker's compensation bodies;

- insurers;
- fund administrators;
- government agencies;
- financial institutions.

Information will only be provided to third parties where it is a requirement for the third party to provide a service of function to Galaxy Resources Limited and where consent has been provided by the person.

In some instances Galaxy Resources Limited is required by law to provide personal information such as the Australian Taxation Office. In these circumstances, Galaxy Resources Limited must comply, and may not request consent.

Enquires from Financial Institutions

Information concerning salary or wages, employment history, status of employment (full or part-time) and length of service will only be given if authorised in writing by the person.

Enquires from Prospective Employers

Galaxy Resources Limited does not provide written references for employees. A Statement of Service is available from Human Resources/Administration. Should a prospective employer contact a Galaxy Resources Limited representative for a reference, information provided will be accurate, fair and based on facts.

A referee may wish to decline to provide a reference.

Security of Personal Information

Personal information may be stored electronically or in a hard copy.

All personal information recorded in hard copy will be stored on the employee's personnel file in secure lockable filing cabinets. All personal information recorded electronically is stored securely on the Company's Human Resources/Administration server.

All personal information regarding unsuccessful candidates collected during the recruitment and selection process will be shredded or deleted from the Company's system after a twelve (12) month period.

Access to Personal Information

In most circumstances, we will provide you access to your personal information.

Requests for personal information must be made in writing to Galaxy Resources Limited, Human Resources/Administration.

In certain circumstances, we may not allow access to your personal information. These may include circumstances where:

- it would have an unreasonable impact on the privacy of others;
- the information relates to existing or anticipated legal proceedings;
- the information would reveal commercially sensitive information;
- providing access to the information would prejudice certain investigations;
- we are required by law not to disclose that information;

- we are requested by an enforcement body performing a legal security function not to provide access as it may damage the security of Australia.

Information from personnel files will only be provided to Company Officers where authorisation has been provided by a member of Human Resources.

Accuracy of Personal Information

In order to ensure the personal information we use and disclose is accurate, complete and up to date; Galaxy Resources Limited has implemented a number of policies and procedures as published on the Company Intranet for updating information.

In addition, you may be contacted in the course of your employment to update necessary contact information.

Outside Australia

The use, collection and disclosure of your information described above may involve us transferring your personal information outside Australia. If we transfer personal information outside Australia, we will comply with trans-border data flow privacy standards under the Privacy Act, for example, by taking reasonable steps to protect the information being held, used or disclosed by the recipient inconsistently with the National Privacy Principles.

Breach

We will monitor compliance with this policy and will investigate any suspected breaches. If a breach is found to have occurred, you will be provided with an opportunity to explain your conduct. If your explanation is unsatisfactory, you will likely be the subject of disciplinary action. For example, this may include a warning, suspension, transfer, demotion or termination of employment. Even non-intentional or "one-off" breaches may result in the full range of disciplinary action. This policy is not a contract and does not give you contractual rights.

5.0 MANAGEMENT RESPONSIBILITIES

Are to ensure that:

- Employees, contractors and consultants are informed of and understand the process;
- concerns raised in the process are fully investigated and dealt with promptly;
- the parties act in accordance with the Company's Equal Employment Opportunity Policy;
- discussions and relevant information are kept confidential.

Where a person believes this policy may have been breached, he/she should disclose that interest by confidential letter to the Human Resources/Administration Representative so the matter may be confidentially discussed.

It is recognised that situations may arise which, while apparently in conflict with this policy, may be acceptable to the Company, however it is important that all such situations be discussed with and approved by Senior Management.

6.0 DEFINITIONS

"Personal information" is any information or an opinion which identifies an individual whose identity is apparent or can reasonably be ascertained from the information.

"People" or "person(s)" includes – employees, contractors, consultants, suppliers and representatives of Galaxy Resources Limited.

Personal information does not include an “employee record”.

An “employee record” is a record of personal information relating to the employment of the employee.

This includes information relating to the:

- engagement, training, disciplining, resignation or termination of an employee;
- terms and conditions of employment of the employee;
- employee’s personal and emergency contact details;
- employee’s performance of conduct;
- employee’s hours of employment, salary or wages;
- employee’s membership of professional or trade associations;
- employee’s recreation, long service, sick, personal, maternity, paternity and other leave;
- employee’s taxation, banking and superannuation affairs.

7.0 PRIVACY OFFICER

Galaxy Resources Limited Privacy Officer can be contacted at:

Privacy Officer
Level 2, 16 Ord Street
West Perth WA 6005

Andrew Meloncelli – Company Secretary
Email: andrew.meloncelli@galaxylithium.com

Attachment A

NATIONAL PRIVACY PRINCIPLES SUMMARY

NPP1: collection

Describes what an organisation should do when collecting personal information, including what they can collect, collecting from third parties and, generally, what they should tell individuals about the collection.

NPP 2: use and disclosure

Outlines how organisations may use and disclose individuals' personal information. If certain conditions are met, an organisation does not always need an individual's consent to use and disclose personal information.

NPPs 3 & 4: information quality and security

An organisation must take steps to ensure the personal information it holds is accurate and up-to-date, and is kept secure from unauthorised use or access.

NPP 5: openness

An organisation must have a policy on how it manages personal information, and make it available to anyone who asks for it.

NPP 6: access and correction

Gives individuals a general right of access to their personal information, and the right to have that information corrected if it is inaccurate, incomplete or out-of-date.

NPP 7: identifiers

Generally prevents an organisation from adopting an Australian Government identifier for an individual (e.g. Medicare numbers, TFN) as its own.

NPP 8: anonymity

Where possible, organisations must give individuals the opportunity to do business with them without the individual having to identify themselves.

NPP 9: transborder data flows

Outlines how organisations should protect personal information that they transfer outside Australia.

NPP 10: sensitive information

Sensitive information includes information such as health, racial or ethnic background, or criminal record. Higher standards apply to the handling of sensitive information.

Attachment B

CHECKLIST FOR COMPLIANCE WITH THE PRIVACY LAWS – MANAGERS

Have you considered the obligations imposed on all employees of the Company by the privacy laws?

Are you aware of obligations placed on Galaxy Resources by the privacy laws?

Have all employees who handle personal, sensitive or health information as a part of their normal day to day duties been trained in privacy laws?

Is coverage of Privacy Laws included in employee inductions?

Have you considered the privacy implications for all new projects?

Is a privacy compliance culture promoted within your area?

Do you know who the Privacy Officer is and how to contact them?

Attachment C

Checklist For Compliance With The Privacy Laws – All People

Have you been trained in privacy laws or attended a privacy briefing session?

Have you considered the privacy implications for all new projects?

Do you only collect personal information that is necessary for Galaxy Resources Limited's functions and activities?

When collecting personal information, do you make sure that individuals providing the information know the purposes for collection, any law that requires collection, the types of organisations to which Galaxy Resources Limited discloses the information, the individual has the right to access their information, any consequences of not providing the information and the Privacy Officer's contact details?

Do you only use and disclose personal information for the primary purpose of collection or a secondary purpose the individual would reasonably expect? If it does not fall within the primary or secondary purpose do you obtain the consent of the individual?

When disclosing personal information to third parties, do you request the third party to sign a privacy agreement which requires them to treat the information in accordance with the privacy laws?

Do you make sure personal information is accurate, complete and up to date?

Do you take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure?

Do you provide individuals with the opportunity to access their personal information in accordance with the Freedom of Information laws?

Do you know where to locate the Galaxy Resources Limited Privacy Policy?

Do you make it available to anyone who asks for it?

When transferring information outside of Australia, do you make sure that the recipient has equivalent privacy laws, the individual consents or you request the recipient to sign a privacy agreement?

Do you only collect sensitive or health information with the consent of the individual, or if it is required or authorised by law?