

RESEARCH DATA GOVERNANCE PRINCIPLES

VG-DAT-015-PUB



PURPOSE

These principles guide proportionate and responsible management of geological, geochemical, geophysical, drilling, research and related data used by Valhalla.

PUBLIC COMMITMENT

- Material data should have an identifiable source, permitted use and accountable custodian.
- Access, security and documentation should be proportionate to sensitivity, value and intended use.
- Personal, Indigenous, confidential and partner data require additional care and applicable permissions.

STATUS	Published
POLICY OWNER	Managing Director
PROPOSED APPROVER	Valhalla Board
PUBLICATION	Published v1.0

1. Application and governance approach

Valhalla is an Australian-based private company. This document is applied in a practical and adaptable manner, with controls suited to the nature and risk of the activity. The Managing Director may set or adjust implementation arrangements, subject to law, contracts and matters reserved to the Valhalla Board. Ordinary operations may proceed within approved budgets and delegations. A significant departure from ordinary operations, material change, unusual commitment, new jurisdiction or matter outside approved authority must be documented and approved before implementation, including by the Valhalla Board where required.

Valhalla may use simple asset lists, repository metadata or project data plans rather than a complex enterprise data catalogue. More detailed controls should be used where data is sensitive, commercially valuable, difficult to replace or relied upon for a significant decision or public claim.

2. Rights, provenance and permitted use

Before material use, Valhalla should have a reasonable basis to understand the data source, ownership or licence, restrictions, consent or cultural conditions, and whether use for AI training, commercialisation or sharing is permitted.

Transformations that materially affect interpretation should be documented sufficiently to explain how the data was cleaned, normalised, combined or derived.

3. Classification and access

Data may be treated as Open, Publishable, Exclusive or Proprietary, with additional sensitivity considerations where appropriate. Access should be limited to people and systems with a legitimate purpose. The Managing Director or project lead may determine practical access arrangements.

4. Quality and fitness for purpose

Data quality should be assessed in the context of the intended use. Known gaps, uncertainty, inconsistent units, sampling limitations, spatial issues, duplicates and potential bias should be considered before material

reliance. Not every dataset requires full remediation where its limitations are understood and appropriately disclosed.

5. Privacy, Indigenous data and security

Personal information must be handled under the Privacy Policy. Indigenous data, knowledge and culturally sensitive information should be handled with regard to relevant permissions, agreements and cultural authority. Security controls should reflect sensitivity and the consequences of unauthorised access, alteration or loss.

6. AI use, retention and disposal

Data must not be entered into an AI or third-party service where that use is inconsistent with rights, confidentiality, privacy, cultural restrictions or contractual terms. Retention should reflect operational, legal, research, contractual and evidentiary needs. Data may be archived, returned or securely deleted when no longer reasonably required.

7. Incidents and correction

Material loss, unauthorised access, misuse or discovery of significant data error should be escalated. Valhalla may restrict use, notify an affected party, correct records, replace data or revise a decision or public statement as appropriate.

Related documents

- Responsible AI and Exploration Assurance Statement
- Privacy Policy
- Security and Responsible Disclosure Statement
- First Nations Engagement, Indigenous Data and Cultural Heritage Commitment

Document control and approval

Public reference	VG-DAT-015-PUB	Version	1.0
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Policy owner	Managing Director	Proposed approver	Valhalla Board
Approved by	C.Dubieniecki	Approved date	August 12th 2026
Review cycle	Bi-Annually or as board requires	Review date	August 12th 2028
Internal source	Research Data Governance Policy		

PUBLICATION CONTROL Published v1.0. This is the current website publication. Procedures may be adapted proportionately, but any substantive amendment to the published commitments requires controlled review, approval and versioning.