

# PRIVACY POLICY

VG-PRI-018-PUB



## PURPOSE

*This policy explains Valhalla's approach to personal information collected through its website, business relationships, recruitment, research and operations.*

## PUBLIC COMMITMENT

- Personal information is collected and used for legitimate business, legal, research and relationship purposes.
- Reasonable security and retention practices are applied in proportion to the sensitivity and use of the information.
- People may request access, correction or consideration of a privacy complaint using the contact details made available by Valhalla.

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

## 1. Application

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 handles personal information in accordance with applicable privacy laws and contractual commitments. This policy is intended to describe general practice and may be supplemented by a collection notice, consent form, research protocol or agreement for a particular activity.

## 2. Information we may collect

- names, roles, organisations and business contact details;
- correspondence, meeting, event, partnership and stakeholder information;
- recruitment, contractor, professional qualification and payment information;
- website, device, log, security and analytics information;
- research or project information where personal information is relevant; and
- other information provided voluntarily or required for a lawful business purpose.

## 3. Collection and use

Information may be collected directly, from an organisation a person represents, from public sources, partners, service providers or project activities. Valhalla may use it to communicate, assess opportunities, manage relationships and contracts, operate and secure systems, recruit personnel, conduct or support research, meet legal obligations and protect legitimate interests.

Where consent or a specific notice is required, Valhalla will seek to provide it in a form appropriate to the activity.

## 4. Disclosure and service providers

Information may be shared with employees, contractors, professional advisers, universities, research partners, technology and cloud providers, regulators or other parties where reasonably required for the relevant purpose, authorised by the person, permitted by law or required by an agreement. Service providers may operate in Australia or other countries, depending on the systems and project arrangements in use.

## 5. Security and retention

Valhalla applies security measures appropriate to the sensitivity and volume of the information, which may include access controls, multi-factor authentication, encryption, backups, logging and contractual protections. No system can be guaranteed completely secure.

Information is retained while reasonably required for business, legal, research, contractual, dispute or recordkeeping purposes and may then be deleted, de-identified or archived.

## 6. Access, correction and complaints

A person may request access to or correction of personal information held by Valhalla, subject to applicable exceptions. Privacy questions or complaints may be submitted using the contact details shown on Valhalla's website or in the relevant collection notice. Valhalla will consider the request and respond in a manner appropriate to its nature and any legal requirements.

## 7. Website and cookies

Valhalla's website may use cookies, logs or analytics tools to operate, secure and understand use of the site. Browser settings may allow cookies to be limited, although some features may not function as intended. Links to third-party sites are governed by those parties' privacy practices.

## 8. Changes

This policy may be updated as Valhalla's website, systems, partnerships and legal obligations change. The current published version will identify its approval and review information.

## Related documents

- Research Data Governance Principles
- Security and Responsible Disclosure Statement
- Responsible AI and Exploration Assurance Statement
- University and Research Collaboration Principles

## Document control and approval

|                  |                                         |                   |                  |
|------------------|-----------------------------------------|-------------------|------------------|
| Public reference | VG-PRI-018-PUB                          | Version           | 1.0              |
| Status           | Published                               | Publication       | Published v1.0   |
| 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  | Privacy and Personal Information 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.