



Privacy Policy

1 Scope

Saracen will comply with this policy in handling Personal Information and Health Information about its employees, clients, customers, suppliers, contractors, consultants and job applicants.

Saracen requires that all of its staff (including casual and contract staff) comply with this policy at all times in collecting and handling Personal Information in the course of their employment or engagement with Saracen.

2 Purpose

Saracen is committed to ensuring that the Personal Information it holds about individuals is handled appropriately and lawfully. Saracen believes that privacy is an important individual right and is important to our business and businesses of our clients.

Most private sector organisations in Australia must, by law, comply with the Privacy Act 1988 (Cth). We will comply with all applicable laws, including the *Privacy Act 1988*, the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*, the Australian Privacy Principles and the *Privacy Amendment (Notifiable Data Breaches) Act 2017*.

3 Definitions

Personal information means information which identifies an individual or from which an individual's identity can be reasonably ascertained and includes Sensitive Information. Names, addresses and home telephone numbers are examples of Personal Information.

Health Information means information or an opinion about individual's physical, mental or psychological health, disability, health services and donation of body parts.

Saracen or the **Company** means Saracen Mineral Holdings Limited (ACN 009 215 347) and its related bodies corporate as defined in the *Corporations Act 2001 Cth*.

Sensitive Information includes information or an opinion about an individual's racial or ethnic origin, political opinions, philosophical or religious beliefs or affiliations, membership of a political, trade or professional association or trade union, sexual preferences or practices, criminal record or Health Information.

4 Application

Saracen will comply with this policy in handling Personal Information about its employees, clients, customers, suppliers, contractors, consultants and job applicants and take all reasonable steps to protect any Personal Information in its care from misuse, loss, unauthorised access, modification and disclosure. This can include relevant staff taking measures such as:

- storing Personal Information in locked cabinets or drawers;

- having a clean desk policy in relation to work related information;
- not allowing others to use your computer passwords and locking your computer when away from their desk;
- not disclosing personal details concerning others.

This list is by no means exhaustive and the security measures taken should be reasonable for the circumstances. If there is any doubt as to the appropriate course of action, the matter should be discussed with your Manager, Human Resources or the Manager - Legal.

If you have any concerns about the way in which Personal Information is being handled, or believe there has been an interference with the privacy of any individual, you should contact your Manager, Human Resources or the Manager - Legal.

This policy also applies to use of the Saracen website. By using the Website, you consent to the collection, use and transfer of information provided by you in accordance with the terms of this Privacy Policy. If you do not agree with this Privacy Policy, do not use the website to provide Personal Information.

Collection of Personal Information

Saracen will only collect personal information if it is necessary for our business purposes, including to comply with legal and regulatory obligations.

Saracen will collect Personal Information by lawful and fair means and not in a reasonable or intrusive manner.

When Saracen collects any Personal Information, it will take all reasonable steps to provide the relevant person information about:

- the identity of Saracen and how to contact it;
- why Saracen is collecting the Personal Information;
- the intended recipients of the information, including the types of organisations (if any) to which Saracen may disclose the Personal Information (e.g. payroll processing services);
- the persons rights to request access to their own Personal Information;
- any law that requires the particular information to be collected; and
- the main consequences of failure to provide that information.

Where reasonable and appropriate, Saracen will collect Personal Information directly from the individual. However there are certain circumstances where Personal Information about an individual may be collected from another party. In either case, Saracen will take all reasonable steps to notify the individual of the matters listed above.

In certain circumstances Saracen may collect Sensitive Information or Health Information. Saracen will only collect this information with your consent or otherwise in accordance with the law.

Use and Disclosure of Personal Information

Personal Information is predominately used for the primary purpose for which it was collected.

Where Saracen needs to use or disclose Personal Information for purposes other than the above purposes, Saracen will obtain consent as appropriate and necessary. Exceptions to this would include where:

- the use or disclosure is required to lessen or prevent serious threat to a person's health or life , or to public health and safety;
- the use or disclosure is required or authorised by the law;
- the use or disclosure is reasonably necessary to assist a law enforcement agency in its law enforcement functions; or
- Saracen or a reputable outside authority suspects fraud or unlawful activity.

Storage of Personal Information

All reasonable steps are taken to protect the security of the Personal Information that we hold. This includes appropriate measures to protect electronic material and material stored and generated in hard copy.

Quality and Accuracy of Personal Information

Saracen will take all reasonable steps to ensure that any Personal Information that Saracen uses or discloses is complete, accurate and up-to-date. If you become aware that any Personal Information Saracen holds is not accurate, you must notify your Manager, Human Resources or the Manager - Legal promptly.

Access to Personal Information

You generally have a right to request access to any Personal Information held by Saracen about you.

There are a number of exceptions to this principle including:

- where providing access would pose a serious and imminent threat to the life or health of any individual;
- where providing access would have an unreasonable impact upon the privacy of other individuals (this may be relevant where information about other individuals is included on a file);
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings where the information would not otherwise be discoverable;
- providing access would be unlawful;
- denying access is required by law;

- providing access would prejudice an investigation of possible unlawful activity; and
- providing access would prejudice law enforcement.

Requests for access should be forwarded to the Human Resources Department or the Manager - Legal.

You should make corrections and additions to your Personal Information to make sure that the information is accurate, up to date and complete. To do this, please contact Human Resources or Payroll (depending on the type of information)

Retention and destruction of Personal Information

Saracen will only keep Personal Information on its files for as long as it is necessary to fulfil its business needs or legal requirements. When Saracen no longer requires the Personal Information, Saracen will destroy or dispose of it in a secure manner.

Overseas disclosure

Saracen does not operate in overseas jurisdictions and is not likely to disclose Personal Information to overseas recipients.

Notifiable Data Breach

Saracen will comply with the *Privacy Amendment (Notifiable Data Breaches) Act 2017* Cth including notifying the Australian Information Commissioner of any data breach that is likely to result in serious harm to any individuals whose personal information is involved in the breach.

Complaints procedure

If an individual complains about their Personal Information being inappropriately handled, then that complaint should be immediately referred to your Manager, Human Resources or the Manager - Legal.

Complaints will be handled confidentially, impartially and as promptly as possible in the circumstances. Only those people who are involved in the investigation of the complaint will have access to Personal Information in relation to the complaint.

Individuals found to have breached this policy will be subject to appropriate disciplinary action, which may include termination of employment or engagement with Saracen.

5 Review

This policy will be reviewed as required but in any event no later than two years from the below date.

Date of revision: 25 June 2018