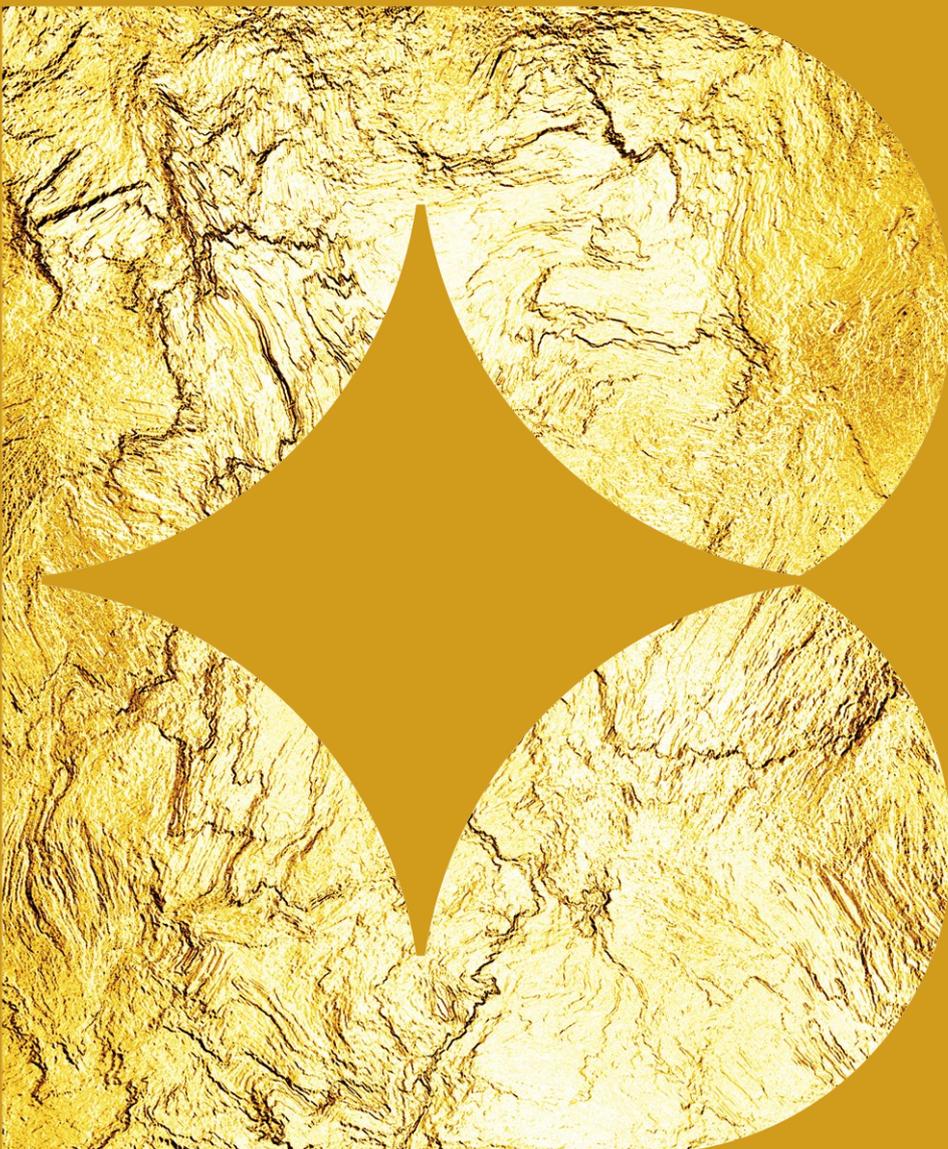


# Privacy Policy

10 December 2019





## Code of Conduct

### Our People

- Diversity & Inclusion Policy
- Equal Employment Opportunity Policy
- Health & Safety Policy

### Community & Environment

- Community Relations Policy
- Donations, Sponsorships and Community Programs Policy
- Environmental Policy
- Modern Slavery Policy

### Business Integrity

- Anti-Bribery and Anti-Corruption Policy (inc. Gifts, Entertainment and Hospitality)
- Code of Conduct
- Conflict of Interest and Related Parties Policy
- Securities Dealing Policy
- Whistleblower Policy

### Safeguarding St Barbara

- Continuous Disclosure and External Communication Policy
- Privacy Policy
- Risk Management Policy
- Social Media Policy

### Key internal documents

- Domestic & Family Violence Policy
- Fitness for Work Policy
- Grievance Resolution Framework
- Leadership Framework
- Mental Health Policy
- Workplace Behaviour Policy

- Health, Safety, Environment and Community Management System

- Whistleblower System

- Delegation of Authorities Matrix
- IT Usage Guideline
- Procurement Policy
- Records Management Policy
- Risk Management Framework
- Tax Management Framework
- Treasury Policy

### Our commitments



**Safety Always**



**Empowered People  
Diverse Teams**



**Stronger Communities**



**Respecting the Environment**



**Growing Sustainably**

### Our values

**We act with honesty and integrity**

**We treat people with respect**

**We value working together**

**We deliver to promise**

**We strive to do better**



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## 1. Purpose

A St Barbara Limited and its subsidiaries (**St Barbara**) are committed to respecting the privacy of your personal information. St Barbara will comply with applicable privacy laws such as the Australian Privacy Act 1988 (Cth), the Australian Privacy Principles, the Canadian Personal Information Protection and Electronic Documents Act (**PIPEDA**) and the Canadian Fair Information Principles in relation to the management of personal information. This Privacy Policy sets out how St Barbara collects, holds, uses and discloses your personal information.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us.

## 2. Employment Information

This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are outside the scope of the privacy laws.

When you apply for a role with St Barbara, certain information may be collected from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to St Barbara to assist in deciding whether or not St Barbara will make you an offer of employment or engage you under a contract.

## 3. What Personal Information is Collected?

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details.

St Barbara may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number and other contact details;
- bank account details;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of your enquiry, including any additional information necessary to respond to your enquiries;
- any additional information relating to you that you provide to St Barbara directly or indirectly through your use of St Barbara's website;
- information you provide to St Barbara when you communicate with St Barbara by email, telephone or other means; or
- any other personal information that may be required in order to facilitate your dealings with St Barbara.

## 4. What about Sensitive Information?

Sensitive information includes information about a person's racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, trade-union membership, health or medical conditions, genetic or biometric information, sexual orientation or criminal convictions and offences. St Barbara will not collect, use or disclose sensitive information about you unless it is necessary to provide you with a product or service and we have your consent, or unless we are legally required to collect, use or disclose that information.



## 5. How is Personal Information Collected?

Where possible, St Barbara will try to collect information from you directly rather than from another person or source, unless it is unreasonable or impracticable to do so.

The choice of how much information you provide St Barbara is yours. Where possible, you have the option of interacting with St Barbara anonymously or using a pseudonym if you feel more comfortable dealing with St Barbara that way. For example, if you contact St Barbara by telephone with a general question, St Barbara will not ask for your full name unless it is needed to answer your question.

St Barbara may monitor emails sent to and from its workforce, which may contain personal information relating to third parties. The information contained in such emails may be used for business-related purposes, for example when investigating incidents within St Barbara. Although St Barbara endeavours not to review the contents of personal emails, there may be occasions where this is necessary, for example, to investigate a breach of security within St Barbara, or in the context of legal proceedings.

## 6. How is your Personal Information Used?

St Barbara may collect, hold, use and disclose your personal information for the following purposes (**Purpose**):

- to communicate with you, including answering your questions and providing you with information;
- provide your information to third parties that assist St Barbara in providing the services you have requested;
- carry out administration, marketing, fraud and loss prevention activities;
- to consider and respond to complaints made by you;
- to comply with laws or regulations or to comply with any directions given by governmental regulators or authorities;
- to enable you to access and use the St Barbara website;
- to operate, protect, improve and optimise the St Barbara website and users' experience, such as to perform analytics, conduct research and for marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you news, announcements and other information that may be of interest to you; and
- to consider your employment application.

## 7. Disclosure of Personal Information

Your personal information may be disclosed in connection with any Purpose to any of the following:

- St Barbara employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business);
- professional advisers, dealers and agents;
- payment systems operators;
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by St Barbara; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

St Barbara may also disclose your personal information if:

- you have consented to the disclosure; or
- where disclosure is necessary to prevent injury to life or health; or
- it is required or authorised by or under law or a court/tribunal order.



As St Barbara operates globally, we may share the personal information you submit to us with any entity within the St Barbara group worldwide. These entities are required to maintain the confidentiality of this information and are restricted from using it for any purpose other than the purposes set out in this Privacy Policy.

## 8. Accessing and Correcting Personal Information

You may request access to your personal information collected by St Barbara, and ask that St Barbara corrects that personal information. You can ask for access or correction by contacting St Barbara's Privacy Officer and you should receive a response within 30 days. If St Barbara refuses to give you access to, or correct, your personal information, St Barbara will notify you in writing setting out the reasons.

## 9. Unsubscribing from Email Subscriptions

From time to time St Barbara may send you news and announcements electronically. You may unsubscribe from St Barbara's mailing list at any time by scrolling to the bottom of our email and clicking "Unsubscribe".

## 10. Security of Your Personal Information

To ensure that all information collected will be safely and securely stored, St Barbara protects your personal information by maintaining your personal information in a secure environment which can be accessed only by authorised personnel. However, no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure.

In addition, St Barbara will take reasonable steps to destroy or de-identify personal information once it is no longer needed for our record retention purposes.

## 11. Notifiable Data Breaches

In the event of any unauthorised access or unauthorised disclosure or loss of your personal information that is likely to result in serious harm to you, St Barbara will investigate and notify you and the appropriate regulatory body in accordance with privacy laws.

## 12. Making a Complaint About Breaches of Privacy

If you believe your privacy has been breached by St Barbara, or if you wish to make a complaint about the way St Barbara has handled your personal information, you can contact St Barbara's Privacy Officer using the contact details set out below.

Please include your name, email address and/or telephone number and clearly describe your complaint. St Barbara will acknowledge your complaint and respond to your complaint within a reasonable period of time (usually within 30 days). If you are not satisfied with St Barbara's response to your complaint, St Barbara will provide you with information about the further steps you can take.

## 13. How to Contact Us

For further information about this Privacy Policy or related practices, or to access or correct your personal information, or make a complaint, please email [privacy@stbarbara.com.au](mailto:privacy@stbarbara.com.au) or contact:

Privacy Officer  
St Barbara Limited  
Locked Bag 9, Collins St East VIC 8003  
(03) 8660 1900

Privacy Officer – Nova Scotia  
Atlantic Mining NS Corp  
Middle Musquodoboit  
Nova Scotia, Canada B0N 1X0  
+902 384 2772

## 14. Review

St Barbara may change this Privacy Policy from time to time by publishing changes to it on its website [www.stbarbara.com.au](http://www.stbarbara.com.au). You are encouraged to check St Barbara's website periodically to ensure that you are aware of St Barbara's current Privacy Policy.

<i>Date Policy first implemented:</i>	<i>28 June 2017</i>
<i>Date of this revision:</i>	<i>10 December 2019</i>
<i>Version number:</i>	<i>2</i>

## Our values

We act with honesty and integrity

We treat people with respect

We value working together

We deliver to promise

We strive to do better

