

Privacy Policy

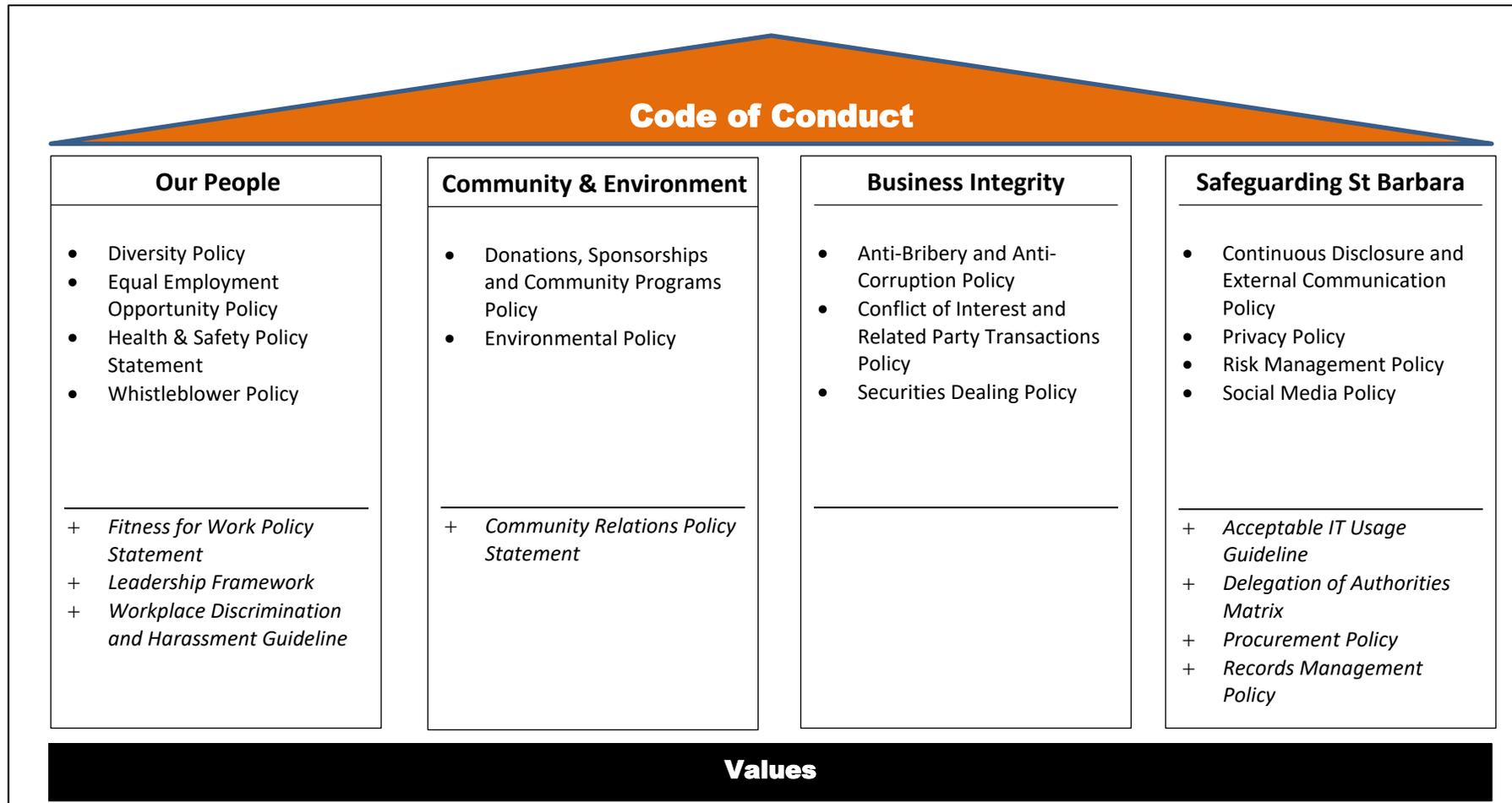
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St Barbara Code of Conduct Framework

This Code is one component of St Barbara’s Code of Conduct Framework.

At the time of publication of this Code, the Code of Conduct Framework includes the following policies and related documents:



● = Policy published on www.stbarbara.com.au ○ = Document in preparation + = Internal document published on ROCKi

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1. PURPOSE

St Barbara Limited and its subsidiaries (**St Barbara**) are committed to respecting the privacy of your personal information. St Barbara will comply with the Privacy Act 1988 (Cth) (**Privacy Act**), the Australian Privacy Principles and other relevant state laws 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 EXEMPT FROM PRIVACY ACT

This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

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. 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.

5. 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;
- to conduct site security access clearances, including but not limited to National Police History checks; and
- to consider your employment application.

St Barbara will not use or disclose a government identifier (such as a tax file number) other than when required or authorised by law.

6. 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 an Australian law or a court/tribunal order.

St Barbara has operations and personnel located overseas, including Papua New Guinea. St Barbara Limited may disclose certain personal information to its related entities in those countries, although such information will typically only relate to employees and internal corporate matters as required as part of St Barbara's business operations. St Barbara may use offshore providers for the storage and processing of personal information and data. St Barbara will take commercially reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

7. 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.

8. 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".

9. 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.

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

Where unsolicited personal information is received that St Barbara could not have otherwise collected, it will be destroyed or de-identified where lawful and reasonable for St Barbara to do so.

10. 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.

11. 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 contact:

Privacy Officer
St Barbara Limited
Locked Bag 9, Collins St East VIC 8003
privacy@stbarbara.com.au
(03) 8660 1900

12. REVIEW

St Barbara may change this Privacy Policy from time to time by publishing changes to it on its website 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.

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