

Effective Date: 22 February 2022

Our aim is to uphold the security of all Personal Information in our possession.

Our commitment

We are committed to managing Personal Information¹ in accordance with this Policy and applicable laws.

Our approach

We will collect, use, disclose, store, secure and dispose of Personal Information lawfully and respectfully.

Our principles

We will:

1. Comply with the:
 - a. Australian Privacy Principles from the Privacy Act 1988 (Cth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth);
 - b. Canadian Fair Information Principles from the Personal Information Protection and Electronic Documents Act (2000) (C.5). and Privacy Act - R.S.C., 1985, c. P-21.
2. Only collect Personal Information which is reasonably necessary for one or more of our business functions or activities.
3. Not collect, use or disclose Sensitive Information² about individuals unless we:
 - a. have the individual's consent, and/or
 - b. are legally required to collect, use or disclose that information.
4. Only use Personal Information and Sensitive Information for the reason it was obtained and other purposes directly related to that primary purpose.

Responsibilities and accountabilities

This is a Policy of St Barbara Limited ("St Barbara") and its controlled entities (collectively, "St Barbara Group"). It applies to all directors, officers, employees, contractors, consultants and suppliers of each member of the St Barbara Group and to any other person or organisation acting for or on behalf of the St Barbara Group ("Personnel").

This Policy will be freely available at all times, reviewed by the Board at least biennially and updated as required. The General Counsel and Company Secretary is responsible for ensuring that this Policy is implemented.

Policy governance

Policy Approver: Board
Policy Owner: General Counsel and Company Secretary
Review Cycle: Biennial

Material policy revisions

Version	Approval Date	Effective Date	Details
3.0	22/02/22	22/02/22	Periodic review

¹ **Personal Information** is information that on its own, or when combined with other information, identifies an individual. Examples include: name, age, gender, postcode and contact details.

² **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.

1. How is Personal Information Collected?

We collect Personal Information through various means as part of our day to day business operations.

Direct

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

It is your choice about how much information you provide. Sometimes you have the option of interacting with us 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, you do not have to provide your full name unless it is needed to answer your question.

Indirect

We will also obtain Personal Information through a variety of other means such as through your indirect interactions (e.g. websites), publicly available sources and from third parties.

We will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Emails

We may monitor emails sent to and from St Barbara's workforce, which can 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.

2. How is your Personal Information Used?

St Barbara may collect, hold, use and disclose your Personal Information for the following business related purposes (**Purpose**):

- to communicate with you and others, 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 support corporate social responsibility activities, internal investigations and debt administration;
- to enable you to access and use the St Barbara website;
- to operate, protect, improve and optimise the St Barbara website, services 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 of interest to you; and
- to recruit, consider your employment application and conduct clearances.

3. Disclosure of Personal Information

Your Personal Information can 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 auditors, insurers, providers for the operation of our websites, data hosting 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.

We can 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 can share the Personal Information you submit to us with any entity within the St Barbara group worldwide (located in Australia, Papua New Guinea and Canada) or hold your data on servers located in a different country. 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.

4. Accessing and Correcting Personal Information

We will take reasonable steps to ensure your Personal Information is current, accurate and complete.

You can:

- request access to your Personal Information collected by St Barbara and/or ask for information to be corrected, subject to certain exceptions; and
- ask for access or correction by contacting St Barbara's Privacy Officer using the contact details set out in section 9 below.

You should receive a response promptly and normally the access will be provided within 30 days.

In most cases your Personal Information will be freely available. For more complex requests (e.g. where the information is held in archives), we reserve the right to charge a fee to cover the cost of retrieving the information for you

To protect your Personal Information, we may need to verify your identity before releasing the requested information.

5. Unsubscribing from Email Subscriptions

While we will try not to spam you, 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".

6. Secure storage of Your Personal Information

To ensure that all information collected will be safely and securely stored, St Barbara protects your Personal Information by storing your Personal Information in a way that reasonably protects it from loss or unauthorised access, theft, copying or alteration.

In addition, St Barbara will take reasonable steps to destroy or permanently de-identify Personal Information once it is no longer needed for the Purpose it was collected and our record retention requirements.

Please note that data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure.

7. 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, we will investigate and notify you and the appropriate regulatory body in accordance with applicable privacy laws.

8. Employee 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.

9. Making a Complaint About Breaches of Privacy

If you:

- have concerns about St Barbara's management of Personal Information, or
- believe St Barbara has breached this Policy or your privacy,

you can make a complaint to St Barbara's Privacy Officer using the contact details set out in section 10 below.

When contacting the Privacy Officer, please include your name, contact details and clearly describe your complaint (include as much detail as possible to assist an effective resolution).

St Barbara's Privacy Officer will acknowledge your complaint and contact you if they require further information. If the Privacy Officer is unable to contact you, this may delay or impact the outcome.

Reasonable endeavours will be made to review and respond your complaint promptly (usually within 30 days or such other time provided by legislation).

If you are not satisfied with St Barbara's response to your complaint, please notify the Privacy Officer and they will provide you with information about the further steps you can take.

10. How to Contact Us

To:

- Receive further information about this Privacy Policy or related practices, or
- Access or correct your Personal Information, or
- Make a complaint,

Please contact the St Barbara Privacy Officer by emailing privacy@stbarbara.com.au or messaging:

Privacy Officer
St Barbara Group
Level 19, 58 Mounts Bay Road, Perth, WA 6000
PO Box 1161, West Perth, WA 6872
Tel: +61 (8) 9476 5555