QUEENSLAND ALUMINA LIMITED

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DATA PRIVACY PRINCIPLES

The following Data Privacy Principles reflect the minimum rules that apply to the processing of personal information at Queensland Alumina Limited.

"We", "us", "our" and “QAL” means Queensland Alumina Limited ACN 009 725 044 of Plant Operations Building, Parsons Point, Gladstone, Queensland, 4680, Australia.

“Data Subject” means the individual to whom personal information relates.

Data Privacy Principle 1

Our processing of personal information is lawful, fair and transparent

We will only process personal information:

- for the legitimate business purpose which we collected it for, and where relevant, as notified in a privacy statement;
- for other purposes that the Data Subject consents to;
- where necessary for the performance of a contract with the Data Subject;
- if the processing is required in order to comply with our legal obligations; or,
- if the processing is expressly permitted under data privacy laws.

Where our policies or the applicable data privacy laws require it, we will notify Data Subjects that we’re collecting their personal information by providing a privacy statement at or before the time we collect personal information from them.

Where personal information has been collected by or from third parties, we will ensure that the personal information is lawfully disclosed to us. This includes confirming that Data Subjects were notified and that a lawful basis exists for the disclosure. We will only process the personal information as permitted by applicable data privacy laws.

Data Privacy Principle 2

We limit our personal information processing

Our personal information processing must be for specific and limited purposes, as notified to the Data Subject.

If we process personal information for a different purpose than that notified, we need to inform the relevant Data Subject(s) of that new purpose and confirm that:

- the Data Subject consents to the processing of his or her personal information for this new purpose;
- the processing is required to comply with an applicable law;
- the new purposes for processing the personal information are compatible with the original processing purposes; or,
- the processing otherwise is lawful under applicable data privacy laws.

Processing for a new purpose will only be found to be compatible with the original purpose where applicable law so provides, or we have assessed and concluded that it is taking into account such factors as the relationship between the initial purposes and the new purpose; the context in which the personal information was collected and expectations of Data Subjects; the nature of the personal information; the consequences of the new processing for Data Subjects; and whether there are privacy safeguards in place.

We must process only that amount of personal information that we need for the relevant processing purpose, and only to the extent necessary for that purpose. Our personal information processing must be adequate, relevant and not excessive.

Data Privacy Principle 3

We maintain data quality

When we process personal information, we take reasonable steps to ensure that:

- personal information is accurate and where necessary, is kept up to date; and
- if personal information is needed to make decisions about a Data Subject but is inaccurate, such personal information is erased, rectified or supplemented (having regard to the processing purpose).

Data Privacy Principle 4

We are careful with sensitive information

Sensitive information is a type of personal information that is of a particularly private nature and includes (among other things) personal information about a person’s race, ethnic origins, trade union membership and health and biometric information, as well as criminal-record information. We must ensure that sensitive information is processed only when necessary and only if:

- the Data Subject consents; or
- if processing is:
  - required in order to comply with our legal obligations,
  - is expressly permitted under local data privacy laws or local labour laws and the relevant personal information originates in that jurisdiction; or
  - necessary to prevent or lessen a serious and imminent threat to the life, health or safety of any person.

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Registered office: Plant Operations Ground, Parsons Point Gladstone, Queensland 4680, Australia

Data Privacy Principle 5

We protect our disclosures of personal information

If we need to disclose personal information outside Queensland Alumina Limited (e.g., to an external service provider), we must ensure that:

- the disclosure is protected by contractual data privacy clauses approved by QAL Legal. This must include an assessment of whether any transfers across national borders comply with applicable data privacy laws;
- the relevant Data Subjects have consented to the disclosure; or,
- the disclosure is otherwise required by law or is expressly permitted under local data privacy laws and the relevant personal information originates in that jurisdiction.

Disclosures within Queensland Alumina Limited are protected by the Privacy Policy.

Data Privacy Principle 6

We must secure personal information

Personal information must be kept secure and protected against accidental, unauthorised or unlawful processing, including against loss and unauthorised access, destruction, misuse, modification or disclosure. This means ensuring that QAL has appropriate technical and organisational measures in place. Data security obligations apply whether personal information is stored in hard copy form (e.g., paper) or in electronic form (e.g., in databases).

Breaches of data involving personal information must be reported immediately to the Company Secretary at cosec@qal.com.au. Where required by applicable data privacy laws, the Company Secretary will ensure that a data breach is notified to the competent authority and affected Data Subjects.

Data Privacy Principle 7

We limit retention of personal information

Personal information must be kept only for as long as necessary for the lawful purpose for which it is processed (as notified to the relevant individuals), or for the time required or permitted under local laws (whichever is the shorter).

After such time, records containing personal information must be securely destroyed (in the case of physical records) or permanently deleted (in the case of electronic records) in accordance with applicable local laws.

To the extent possible, all archived copies and back-up copies should be destroyed at the same time and in the same manner as any original records that contain the personal information.

Data Privacy Principle 8

We respect Data Subject rights

Data Subjects have the right to:

- seek access to personal information that QAL holds about them;
- seek correction of inaccurate, incomplete or out of date personal information;
- seek erasure of their personal information;
- be provided with information about how their personal information is processed;
- ask for processing of their personal information to cease;
- be notified if QAL has made a decision about the Data Subject that is based on automated data processing alone;
- complain about the processing of their personal information; or
- withdraw previously given consent regarding QAL's processing of their personal information.

There are legal exceptions to the exercise of these rights, and QAL will review each request on a case by case basis, by reference to the data privacy laws in Australia.

Requests from Data Subjects to access their rights should be notified to the Company Secretary who will advise on how the request needs to be responded to.

Data Privacy Principle 9

We apply privacy by design

We must ensure that data privacy compliance is integrated into our personal information processing activities. Where necessary, QAL Legal will undertake a privacy impact assessment to identify steps that must be taken to mitigate the risk and to ensure that QAL complies with its obligations under applicable data privacy laws.

Data Privacy Principle 10

We don't spam

We must limit our use of personal information to send marketing communications. All marketing communications (however distributed) must:

- clearly identify QAL as the sender and how it can be contacted;
- be sent with the consent of the recipient/Data Subject; and,
- contain an unsubscribe or opt out facility. Where Data Subjects opt out, these must be actioned and records amended accordingly.

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