

PRIVACY STATEMENT – EMPLOYEE SURVEYS

PURPOSE

1. This Privacy Statement explains how Queensland Alumina Limited (**‘QAL’**, **‘we’**, **‘us’**, **‘our’**) will collect, use and disclose Personal Data during Employee Surveys. Personal Data is collected and processed (which includes disclosure) in accordance with this Privacy Statement – Employee Surveys (**Privacy Statement**) and our P901.004 Privacy Policy (**Privacy Policy**) and GM-007 Data Privacy Principles (**Data Privacy Principles**). Our Employee Surveys are voluntary. Our purpose in collecting and processing your data is to hear from our employees.
2. Where we need to identify a legal basis for collecting and processing your Personal Data, we rely on our legitimate interests which include assessing employee engagement, effective management and improvement of our business, employee development and understanding more about our employee relationships and our working environment.
3. Further information on the types of Personal Data collected, processed and disclosed are included in this Privacy Statement.
4. Our Surveys are voluntary. While we hope you will complete any Surveys we issue, you do not have to respond if you do not want to. However, once you have completed the Survey we will collect and process any Personal (and Sensitive) Data you may have provided. We ask that you do not include any Personal or Sensitive Data that may identify you in any of your Verbatim Comments as these may be provided to your Leader to enable review and reflection.
5. Further information, including your rights with regard to Personal Data are found in our Privacy Policy and Data Privacy Principles.
6. This Privacy Statement explains how we will collect, use and disclose employee and contractor (“you”, “your”) Personal Data and your rights in relation to your Personal Data. It should be read in conjunction with our Privacy Policy and Data Privacy Principles. Where there is conflict between our Privacy Policy and Data Privacy Principles and this Privacy Statement, this Privacy Statement will prevail.
7. QAL Employee Surveys (“Survey/s”) are voluntary. We survey people so that we can hear from you. While we hope you will complete any Surveys we issue, you do not have to respond if you do not want to.

DEFINITIONS

8. For the purposes of this Privacy Statement and Surveys, the following definitions apply:

De-identified	means that responses cannot be attributed to any employee, and their responses are grouped to enhance anonymity and guard against re-identification of employees.
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HR	means QAL's Human Resources team.
Limited Personal Data	means name, email, year of birth.
Personal Data	mainly includes name, email, year of birth, role type, role group, gender, age range, language, length of service, location, functional area, management line, talent program.
Sensitive Data	includes health, medical, cultural and ethnicity data. We ask that you do not disclose any Sensitive Data in the Verbatim Comments, but if you do it will be collected, processed and disclosed as per Clause 9 below.
Survey Service Provider	Any third party that QAL engages to either conduct a Survey on our behalf or analyse the results of any Survey.
Verbatim Comments	means any comments or opinions provided in the free text boxes in the Survey which may include Personal and/or Sensitive Data if you include it in the Verbatim Comments. It is strongly encouraged that you do not provide any Personal and/or Sensitive Data in the Verbatim Comments, but if you do, the data will be collected and processed.

WHAT PERSONAL DATA IS COLLECTED, WHY IT IS PROCESSED AND WHERE IS IT DISCLOSED?

9. As part of any Surveys, Personal Data may be collected and processed in two ways:
- 9.1. We may provide some Personal Data to a Survey Service Provider (if we are using a third party to help us administer the Survey) in advance of the Survey being issued to us. In such cases, the Service Provider will collect, process and disclose the Personal Data for the purposes set out in the table below.
- 9.2. The Survey Service Provider collects and process Personal Data directly from you (and if you provide it, Sensitive Data) when you respond to the Survey. The Service Provider will disclose this Personal Data and Sensitive Data to QAL for the purposes set out below.

Personal Data collected, processed, and disclosed by QAL to Survey Service Providers	
Type of Personal Data	Examples of why it is processed and where it is disclosed
Limited Personal Data	To enable the Survey Service Provider to:



	<ul style="list-style-type: none"> • Validate participants as QAL employees eligible to participate in the Survey. • Administer the Survey and email invitations to participate to eligible employees.
Personal Data	To enable the Survey Service Provider to assess and appropriately analyse Survey results.
Personal Data collected and processed by Survey Service Providers and disclosed to us	
De-identified Survey results De-identified Verbatim Comments	<ul style="list-style-type: none"> • To enable Survey results to be provided to QAL Leaders who meet certain Survey criteria, including confidentiality requirements, to receive results. • To conduct further HR data analytics and correlate with other QAL data e.g. safety metrics, training attendance, or workforce turnover data to generate insights. • To develop various, targeted employee programs and improvement strategies including retention analysis and initiatives. • To enable QAL to disclose data and/or insights with external consultants engaged to develop strategies to improve workplace culture.
Identified Survey Results including identified Verbatim Comments	<ul style="list-style-type: none"> • To enable a limited number of people in QAL who need to receive these results to assess and analyse the results. • To enable post survey data to be extracted back into QAL for HR data analysis and data science activities. • As part of undertaking HR data analysis and data science activities, data will be linked by QAL to other Personal and Sensitive Data already held by QAL. This data may include ethnicity and sexual orientation (where this has been lawfully collected by QAL) and incident data. • To enable the creation by QAL of additional aggregated and anonymised reporting that will be shared with appropriate QAL leaders. No reports that identify employees will be produced. • To support the development of various, targeted employee programs and improvement strategies including retention analysis and initiatives. • To enable QAL to disclose data and/or insights with external consultants engaged to develop strategies to improve workplace culture.



<p>Identified Verbatim Comments</p>	<p>QAL leaders may receive Identified Verbatim Comments to enable them to review and reflect on them.</p> <p>The disclosure of Personal or Sensitive Data to them would only occur if you have provided such data in the Verbatim Comments that have the result of identifying you or another person.</p> <p><u>We ask that you do not provide Personal or Sensitive Data in Verbatim Comments.</u></p>
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LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

10. As the Survey is voluntary, we do not rely on consent as the legal basis to process your Personal Data. This is because once you have chosen to complete the Survey and your responses have been recorded you cannot withdraw your consent.
11. For the purposes of the Survey, we process your Personal Data (and any Sensitive Data you may provide in Verbatim Comments) for the legitimate interests of QAL which include assessing employee engagement, effective management and improvement of our business, employee development and understanding more about our employee relationships and our working environment

INTERNATIONAL DATA TRANSFERS, SECURITY, DATA RETENTION, YOUR RIGHTS AND ADDITIONAL INFORMATION

12. Information about how International Data Transfers, data retention, your rights and additional information can be found in our Privacy Policy and Data Privacy Principles.

