

Privacy Policy

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Department: **Company** Owner's Role: **General Counsel**
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 Category: **Business Integrity** Person Making Latest Change: **K Hands**
 Reviewed by: **K Hands** Review Date: **13.12.2023**

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1.0 PURPOSE

Queensland Alumina Limited is an entity bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**). This Policy communicates our personal information handling practices which are underpinned by our **Data Privacy Principles (GM-007)**.

For the purposes of this Policy:

- "We", "us", "our" and "QAL" means Queensland Alumina Limited ACN 009 725 044 of Plant Operations Building, Parsons Point, Gladstone, Queensland, 4680, Australia
- "Process" and "processing" cover everything we might do with personal information.

2.0 SCOPE

Personal information means information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

3.0 RESPONSIBILITIES

Within the policy

4.0 POLICY

4.1 WHAT PERSONAL INFORMATION DO WE COLLECT?

The personal information we collect about you depends on the nature of your dealings with us and what you choose to share with us. The personal information we collect about you may include:

- **Identification data** (e.g., name, gender, job title, date of birth, photograph)
- **Contact details** (e.g., home and business addresses, email address, telephone number)
- **Recruitment-related information** (e.g., qualifications, employment history, interests, types of roles you are interested in, work applications, resumes)
- **Usage information** (e.g., IP address, browser type, operating system, browser language, access times, time zones)
- **Sensitive information** (e.g., racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual preferences, criminal record, or health information)
- **Other information** (e.g., security records when you access the QAL site, CCTV footage, communications with you involving complaints)

If we collect your sensitive information, we will do so only with your consent (you will voluntarily share the information with us), if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

Please note that you do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way (anonymously or by way of a pseudonym) or choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

4.2 HOW DO WE USE YOUR PERSONAL INFORMATION?

We use personal information for many purposes in connection with our functions and activities, including the following purposes:

- **Human resources purposes** such as administering and managing employment contacts and contracts of engagement.
- **Business purposes** such as supplying goods to customers or acquiring services from suppliers, entering into and fulfilling contracts, for communications and external relations purposes. This is often limited to 'business contact' information about contact people within companies and agencies and information about interactions with us.
- **Community engagement purposes** such as information collected from members of the Gladstone community for the purposes of engaging and interacting with that community. This will include names, contact details and information about the interactions of individual community members with us, where needed to respond to correspondence and to manage community relationships.
- **Safety and security purposes** such as information to verify identity of visitors and collection of images by closed circuit television (CCTV) or aggregated data from the open-source internet that might contain user names and other personal data published by users of public pages, to alert or signal potential security risks and threats.
- **Legal purposes** such as information obtained to meet obligations under anti-money laundering legislation and whistleblowing legislation.

4.3 DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your personal information to third parties in accordance with this Policy in circumstances where you would reasonably expect us to disclose your information. For example, we may disclose your personal information to:

- our related bodies corporate, including Rio Tinto Aluminium Limited (ABN 51 009 679 127), RTA Holdco Australia 5 Pty Ltd (ACN 128 785 599), Rio Tinto Limited (ABN 96 004 458 404), Rio Tinto Plc (Company Number 719 885), Alumina & Bauxite Company Ltd, and Rusal Limited.
- our external service providers who may perform services for the Company or on the Company's behalf (e.g., IT providers);

- our professional service advisors (e.g., auditors, accountants, lawyers); or,
- a new owner of QAL where the ownership or control of all or part of QAL changes.

We may also disclose your personal information to others where it is authorised by law to do so or where you have expressly consented to the disclosure.

4.4 TRANSFER OF PERSONAL INFORMATION OVERSEAS

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia. Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
 - the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
 - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court order.

4.5 HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- having a robust physical security of our premises and databases;
- taking measures to restrict access to only personnel who need that personal information to effectively provide services to you; and,
- having technological measures in place (for example, anti-virus software, fire walls).

4.6 ONLINE ACTIVITY

With the exception of the use of cookies, we generally do not seek to collect personal information through our website at www.gal.com.au. However, if you choose to provide your personal information to us through this website (e.g., by sending a complaint or query), we will process that personal information to respond to that complaint or query.

4.6.1 Cookie Privacy Statement

We collect information about how you access, use and interact with our website at www.gal.com.au through the use of cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website.

We do not use cookies to identify you but rather, we use them to enhance your experience on our website. If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. Please be aware that your browsing experience of our website may be affected if you decide to block or remove cookies.

Please contact the Company Secretary at cosec@gal.com.au if you would like to receive a list of the cookies that we use on our website, their function, and their duration.

4.6.2 Links to Third Party Websites

Our website may contain links to websites operated by third parties. If you access a third-party website through our website, personal information may be collected by that third-party website. We make no representations or warranties in relation to the privacy practices of any third-party provider or website and we are not responsible for the privacy policies or the content of any third-party provider or website. Third-party providers are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies

4.7 RETENTION OF PERSONAL INFORMATION

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws (e.g., record keeping obligations).

4.8 ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

You have the right to:

- (a) access personal information that we hold about you; and,
- (b) correct personal information that we hold about you where it is inaccurate, incomplete or out-of-date.

If you would like to access or correct your personal information, please complete and submit the **Data Subject Request Form** to the Company Secretary at cosec@qal.com.au.

Please be advised that you will be required to verify your identity before the Company can give you access or correct your personal information. This is to ensure that the Company does not give your personal information to anyone else.

4.9 COMPLAINTS

For complaints about how we handle, process or manage your personal information, please complete and submit the **Data Subject Request Form** to the Company Secretary at cosec@qal.com.au. We may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 30 days for us to respond to your complaint. We acknowledge that it is not always possible to resolve a complaint to everyone's satisfaction. As such, if you are unsatisfied with our response to your complaint, you have the right to contact the [Office of the Australian Information Commissioner](#) to lodge a complaint.

4.10 How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

Email: cosec@qal.com.au

Phone: 07 4976 2211

Post: Attention: Company Secretary
Parsons Point
Gladstone, Qld, 4680
Australia

5.0 ATTACHMENTS

Nil

6.0 REFERENCES

***Privacy Act 1988 (Cth);
Australian Privacy Principles (APPs);
GM-007 - Data Privacy Principles;
GM-006- Data Subject Request Form.***

7.0 DEFINITIONS

Attach. 5.1 - Data Privacy Principles

8.0 REVISION HISTORY

Iss	Rev	Date	Author / Reviewer	Change Reason	Approver
1	1	13/12/2023	Karen Hands	5.0 was a duplication of 4.0. As such it has been removed. At the new 10.0, in heading "Access and correction your personal information", added the word "of".	General Manager

In 1.0, the Data Privacy Principles was referred as Schedule 1. Changed this to refer to the name and form number GM-007, rather than refer to it as an attachment to the policy.
New 14.0 added for "References", with content also added under heading.

1	0	01/06/2022	Allyson Yule	Initial Creation	General Manager
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