



## Privacy Policy

---

The aim of this Policy is to implement and embed a consistent privacy policy that sets out how Stanmore collects and manages Personal Information and how we comply with the Australian Privacy Principles contained within the Privacy Act.

---

## TABLE OF CONTENTS

---

<b>1.</b>	<b>Terms and Definitions</b> .....	<b>3</b>
<b>2.</b>	<b>Scope</b> .....	<b>3</b>
<b>3.</b>	<b>What Personal Information do we collect?</b> .....	<b>3</b>
3.1	Personal Information .....	3
3.2	Sensitive Personal Information .....	4
<b>4.</b>	<b>How do we collect Personal Information?</b> .....	<b>4</b>
<b>5.</b>	<b>How do we disclose Personal Information?</b> .....	<b>4</b>
5.1	General.....	4
5.2	Overseas disclosure.....	5
5.3	Using our website.....	5
<b>6.</b>	<b>How do we hold and secure Personal Information?</b> .....	<b>5</b>
<b>7.</b>	<b>How do we retain Personal Information?</b> .....	<b>5</b>
<b>8.</b>	<b>Your rights</b> .....	<b>5</b>
8.1	Making a request.....	5
8.2	Making a complaint .....	6
<b>9.</b>	<b>Privacy Officer</b> .....	<b>6</b>
<b>10.</b>	<b>EU GDPR</b> .....	<b>6</b>
<b>11.</b>	<b>Compliance and Review</b> .....	<b>6</b>

## 1. TERMS AND DEFINITIONS

In this Policy:

<b>Personal Information</b>	means information or an opinion (whether true or not and whether recorded in material format or not) about an identified individual or an individual who is reasonably identifiable.
<b>Privacy Act</b>	means the <i>Privacy Act 1988</i> (Cth)
<b>Stanmore</b>	means Stanmore Resources Limited and its related bodies corporate.

## 2. SCOPE

This Policy applies to all Personal Information collected during the course of business interactions conducted by Stanmore.

We require all directors, employees and contractor staff of Stanmore to comply with this Policy.

We expect suppliers to comply with this Policy or implement consistent standards with respect to handling any Personal Information.

Certain exemptions apply under the Privacy Act in relation to employee records and we may rely on those exemptions despite this Policy.

## 3. WHAT PERSONAL INFORMATION DO WE COLLECT?

### 3.1 Personal Information

We may collect Personal Information from customers, contractors, suppliers, employees, job applicants, landowners, community organisations, shareholders and visitors to our offices, sites and website.

The types of Personal Information that Stanmore may collect, hold and use includes:

- **(General business)** personal or business details, such as your name, job title, organisation, phone number, address and email address and other information necessary for the purpose of Stanmore conducting business with you or your organisation.
- **(Shareholders)** information about our retail shareholders and individuals who may be employed by or contracted to institutional shareholders, such as your name, contact details, shareholding, and other information necessary to establish and maintain the shareholder relationship.
- **(Employees and contractors)** personal and employment information, such as your name, contact details, date of birth, qualifications, work competencies and assessments, financial information and other information necessary for the purpose of establishing and maintaining an employment or contractual relationship with you. This may also include sensitive information, such as health and medical information and drug and alcohol testing results for the purpose of monitoring compliance with our policies and standards.
- **(Job applicants)** personal and employment information, such as your name and contact details, employment and academic history, qualifications and skills, professional affiliations and memberships, relevant record checks, and information on your professional interests for the purpose of entering into an employment contract with you, assessing your suitability for the job applied for and complying with legal or regulatory obligations. This information may be collected from you directly, from any recruitment consultant and from your previous employers and others, including referees and publicly available sources. Stanmore may also require prospective employees to undergo certain medical and other checks for the same reasons as set out above.

- **(Community)** information we collect as part of our Community Grants Program, such as your name, job title, organisation name, phone number, address and email address for the purpose of inviting applications and assessing suitability of the recipient for a grant from Stanmore.
- **(Visitors to premises)** when you visit a Stanmore office or site, Stanmore records information about you, such as your name, organisation, address and phone number for the purpose of health, safety and security procedures and practices.
- **(General enquiries)** information you provide to Stanmore when you make enquires by phone, email, post or through our website, such as your name, email address or other contact details for the purpose of responding to your queries and requests.

Where it is lawful and practicable for Stanmore to allow it, you have the right to not identify yourself when dealing with us. However, not providing us with your Personal Information may impact on our ability to provide you with certain services. For example, we will be unable to register you as a shareholder of Stanmore without first collecting your name and address.

### 3.2 Sensitive Personal Information

Under the Privacy Act, certain categories of Personal Information are considered particularly sensitive and therefore need additional protection. This includes information about racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, trade-union membership, health, genetic or biometric information, sexual orientation, or criminal convictions. Stanmore will only collect, hold and use your sensitive Personal Information where we have obtained your explicit consent or where we have other lawful grounds to do so under applicable law.

## 4. HOW DO WE COLLECT PERSONAL INFORMATION?

We will only collect Personal Information by lawful and fair means. Stanmore will generally collect Personal Information directly from you if possible. However, we may also collect Personal Information from third parties, such as Stanmore's share registry provider and recruitment agents. Stanmore may also receive third party Personal Information through its employees and contractors, including details of family members and next of kin.

## 5. HOW DO WE DISCLOSE PERSONAL INFORMATION?

### 5.1 General

When required for the purpose of conducting our business, Stanmore may disclose your Personal Information:

- between related bodies corporate of Stanmore;
- to third party business service providers including (but not limited to):
  - Professional advisers such as auditors, legal advisers, accountants;
  - IT service providers;
  - Providers of Stanmore's share registry services;
  - Recruitment providers;
  - Outsourced services when required, such as payroll;
- to joint venturers of Stanmore;
- to third parties if we sell, buy or merge any businesses or assets, including to a prospective buyer or seller;
- to government agencies, regulatory bodies and law enforcement agencies, where required;
- where necessary to lessen or prevent a serious threat to the life, health or safety of any individual;

- if the person to which the Personal Information relates has consented; or
- where disclosure is required or permitted by law.

## 5.2 Overseas disclosure

Stanmore may disclose your Personal Information to recipients located outside of Australia in the course of us conducting our business. The countries may include the United States of America, Canada, Japan, South Korea, Indonesia, China, Singapore, India, Taiwan and regions, South America, and the European Union.

## 5.3 Using our website

Stanmore uses cookies to provide a better browsing experience and improve website functionality. We will only collect information about you where it is fair and lawful. We will not collect more information than we need to improve website performance.

Most browsers allow you to control cookies through their settings preferences. If you limit the ability of websites to set cookies, your user experience will no longer be tailored to you. By continuing to use the Stanmore website you consent to the use of cookies.

Stanmore's website may also detect and record your use of our website, such as which pages you visit, the time and date of your visit, your broad geographic location etc. We may track the patterns of usage of visitors to the website for the purposes of website development and statistical monitoring. We do not obtain Personal Information through your use of our website.

## 6. HOW DO WE HOLD AND SECURE PERSONAL INFORMATION?

Stanmore may hold your Personal Information either in electronic or hard copy form. We use a number of physical and electronic measures to keep your Personal Information secure, including restricting physical access to our offices, maintaining firewalls, providing access based restrictions on IT systems and utilising password protected IT systems with two factor authentication (where available).

However, the internet is not a secure environment and therefore, Stanmore cannot guarantee the security of information provided to it via electronic means.

## 7. HOW DO WE RETAIN PERSONAL INFORMATION?

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). Stanmore's aim is to keep your Personal Information for no longer than is necessary for compliance or other legitimate business purposes.

## 8. YOUR RIGHTS

### 8.1 Making a request

You have the right to request:

- access to Personal Information that Stanmore holds about you;
- that Personal Information that Stanmore holds about you be corrected if it is inaccurate or incomplete; and
- to opt out of receiving any communications from us.

If you would like to request any of these matters, please contact our Privacy Officer at the contact details below.

## 8.2 Making a complaint

If you have a complaint concerning Stanmore's handling of your Personal Information, please contact the Privacy Officer at the contact details below. Please include your name, email address or telephone number and provide details of your complaint.

The Privacy Officer will investigate your complaint and respond promptly. If you consider that Stanmore has failed to resolve the complaint satisfactorily, you can complain to the Office of the Australian Information Commissioner.

## 9. PRIVACY OFFICER

If you require further information on privacy matters relating to Stanmore, please contact the Privacy Officer at the contact details below:

Privacy Officer  
Stanmore Resources Limited  
GPO Box 2602, Brisbane QLD 4001  
Phone: +61 7 3238 1000  
Email: info@stanmore.net.au

Stanmore may modify or update its Privacy Policy from time to time by publishing it on our website (<https://stanmore.net.au>). We encourage you to check Stanmore's website to ensure that you are aware of our current Privacy Policy.

## 10. EU GDPR

If you are a citizen or resident of the European Union (**EU**) then you may be considered a Data Subject under the EU General Data Protection Regulation (**GDPR**) and you have the right to:

- access your data;
- have your data deleted or corrected where it is inaccurate;
- object to your data being processed and to restrict processing;
- withdraw consent to having your data processed;
- have your data provided in a standard format so that it can be transferred elsewhere; and
- not be subject to a decision based solely on automated processing.

These are collectively referred to as Data Subject Rights.

We have processes in place to deal with Data Subject Rights. Our actions and responsibilities will depend on whether we are the controller or processor of the personal data at issue. Depending on our role as either a controller or processor, the process for enabling Data Subject Rights may differ, but we are always subject to applicable law. Please contact our Privacy Officer if you would like to make a Data Subject Rights request or have a need for assistance with a Data Subject Rights request.

## 11. COMPLIANCE AND REVIEW

Stanmore personnel must immediately report any actual or suspected breaches of this Policy to their line manager or senior manager. The Privacy Officer (or their delegate) must investigate all reported actual or suspected breaches of this Policy and report to the board of directors of Stanmore as required.

Stanmore's General Counsel is responsible for the oversight of this Policy and will periodically review this Policy and make any necessary changes to ensure that it meets all regulatory and legislative requirements