

# GLENCORE

## Privacy Policy

### 1 Our Commitment to Privacy

Protecting your privacy is very important to Glencore Australia Holdings Pty Ltd, and its Australian related bodies corporate (**Glencore, our, us** or **we**). We are committed to complying with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) (**Privacy Act**) which require us to have an up-to-date policy about how we manage Personal Information. This Privacy Policy details how we collect, use and manage Personal Information.

The information in this Privacy Policy is supported by our Privacy Collection Statements, which provide specific information about how we collect, hold and handle your Personal Information depending on the type of relationship you have with us:

[Customers and Counterparties](#)

[Visitors to our Offices and Sites](#)

[Landholders or Occupiers](#)

[Community Stakeholders](#)

[Applicants for Employment](#)

### 2 The Kinds of Personal Information We Collect and Hold

Personal Information is information about you. We may collect and handle a range of Personal Information depending on the type of interactions you have with us. Personal Information that we collect includes:

- **Contact Details:** name, current and previous addresses, date of birth, telephone number, and gender.
- **Transactional information:** bank account and credit card details, Australian Business Numbers, and superannuation details.
- **Web Information:** your email address, IP address or MAC address.
- **Employment Information** (if you are applying for employment): employment history and experience, qualifications, and proof of right to work.
- **Security and travel information:** passport information, drivers licence number, nationality, visa details.

We may also collect Sensitive Information, such as your health or medical information, biometric information and information about your ethnicity or race if it is reasonably necessary to comply with the law or if it is required to administer aspects of the relationship between you and Glencore.

### 3 How We Collect Your Personal Information

We collect your Personal Information directly from you unless it is unreasonable or impracticable to do so.

We will collect your Personal Information when you:

- engage with us in relation to business operations or provide services to us;
- use our online platforms, WiFi services and social networks;
- call, post or email us;
- apply for employment opportunities with us; or
- are recorded through electronic monitoring (i.e. drones, closed circuit television (CCTV), portable cameras, and security access control systems).

Depending on our relationship with you, we may also collect your Personal Information indirectly, including from publicly available sources, third parties you have authorised to share your information, current or former employers, educational institutions, professional and trade associations, authorised representatives, agents, or third parties who are authorised to share Personal Information (referees).

For prospective customers and counterparties, we may also collect your Personal Information from third parties (some of whom may be our agents) who have identified you as someone who may wish to purchase our products or provide services to Glencore.

In some instances, we may combine and link your Personal Information to interact with you.

### 4 Why We Collect Your Personal Information

We collect, use and disclose your Personal Information so we can identify and engage with you for the purposes of conducting our business, including:

- Operating our business and our sites and offices, including for administrative, planning, product or service development and delivery purposes;
- Supporting our procurement and on boarding processes;
- Ensuring the safety and security of our personnel and visitors, as well as our sites, offices, facilities and equipment;

- Engaging with our potential and actual customers and counterparties;
- Providing logistical services and other products and services to you, or providing you with a quote or offer for our products and services;
- Conducting construction and project management activities; and
- Providing employment opportunities.

If you do not provide your Personal Information, we may not be able to engage with you, either in the way we ordinarily do or at all. Depending on our relationship with you, this may mean that we are limited or prevented in respect of entering into a contract with you, responding to your enquiries or engaging you as an employee or contractor.

We will allow you to deal with us anonymously or using a pseudonym, where it is lawful and practical to do so, such as when you make a general enquiry.

## 5 When We May Disclose Your Personal Information to a Third Party

We may disclose your Personal Information to third parties as part of our business operations, including to the following third parties:

- information technology service suppliers;
- operational and maintenance contractors;
- marketing and advertising contractors;
- mailing and logistics providers;
- government and regulatory authorities; and
- professional advisors (such as accountants, auditors and lawyers).

When third parties act on our behalf, we ask them to handle your Personal Information in accordance with the Privacy Act and other relevant privacy laws.

We may disclose your Personal Information to our global offices and third parties overseas. Further information can be found in the relevant Privacy Collection Statement.

## 6 How We Store and Secure Your Personal Information

We will store your Personal Information for as long as required by our business operations or relevant laws. When we are no longer required to hold your Personal Information, we will destroy it securely or de-identify it.

We use appropriate technical and organisational security measures to secure your Personal Information, including:

- website security systems and controls (i.e. firewalls, data encryption and intrusion detection systems, system access restrictions);
- physical security (i.e. site access controls); and
- information security policies and standards for employees and contractors.

## 7 Accessing and Correcting Personal Information

We take reasonable steps to ensure the Personal Information we collect, use and disclose about you is correct, complete and relevant for the purposes for which we collect it.

You have a right to request access to your Personal Information and to request for it to be updated or corrected. If the request is complex or we incur additional costs in providing you with access, we may charge you a reasonable fee for preparing the Personal Information. If there is a charge, we will let you know in advance so that you can decide whether you wish to proceed.

In some circumstances, we may refuse to give you access to your Personal Information, in accordance with the Privacy Act and other relevant laws.

To protect your Personal Information we will always confirm your identity with you before giving you access to any information or making any changes.

You can make a request by contacting the Glencore Privacy Officer by email at [privacy@glencore.com.au](mailto:privacy@glencore.com.au).

## 8 Resolving Complaints

If you have a complaint about how we have dealt with your Personal Information, please contact us using the details below. We will investigate your complaint and provide you with a formal response, usually within 30 days. If the circumstances of your complaint are complex and we need additional information or time to provide you with a formal response, we will contact you to let you know.

If you are not satisfied with our response, then you may lodge a formal complaint with the Office of the Australian Information Commissioner ([enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or [www.oaic.gov.au](http://www.oaic.gov.au)).

### Contact Us

Email: [privacy@glencore.com.au](mailto:privacy@glencore.com.au)

This Privacy Policy was last updated on 7 July 2019.