



# **Privacy Policy**

**Atlas Iron Limited**

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## 1 PURPOSE

Atlas Iron Limited (**Atlas**) is committed to respecting the privacy of your personal information. This Privacy Policy sets out our personal information management practices. It covers the following areas:

- Application of privacy laws;
- Personal information collected;
- Use and disclosure of personal information;
- Accessing and updating your personal information;
- Security of personal information; and
- Contact details.

Throughout this Privacy Policy, we refer to your “personal information” which means information which identifies you as an individual or from which your identity can be reasonably ascertained. Your personal contact details are examples of personal information.

References to “Atlas”, “us”, “we” and “our” are references to Atlas Iron Limited and its related bodies corporate.

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## 2 APPLICATION OF PRIVACY LAWS

Atlas is bound by the Australian Privacy Principles under the Privacy Act 1988 (as amended or superseded) and other applicable Commonwealth and State laws which protect your privacy. Atlas sometimes handles personal information relying on exemptions under these laws, for example in relation to:

- employee records;
- related bodies corporate;
- provision of services to State or Territory authorities; and
- operations outside Australia relating to personal information of non-Australians.

Any permitted handling of personal information under such exemptions will take priority over this Privacy Policy to the extent of any inconsistency.

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## 3 PERSONAL INFORMATION COLLECTED

We only collect personal information that is necessary for our functions and activities. Purposes for which we may collect personal information include but are not limited to resolving any queries you may have or processing your application for employment with Atlas.

Generally, we try to collect personal information directly from you however there are certain situations in which we may collect personal information about you from someone else.

In certain circumstances we may collect sensitive information such as criminal record

information. We will only collect this information with your consent or otherwise in accordance with the law.

Generally the types of personal information we collect will include name, contact details, and records of communications with Atlas. In addition we collect personal information relating to:

- Shareholders: information about the shareholding, banking details, and tax file numbers for payment of dividends and other amounts;
- Employees: information collected about employees includes birthdates, address details, phone numbers, email addresses, health and workers compensation information, banking and tax file number details and photographs. We may also collect your information through monitoring use of our information technology systems and resources;
- Job applicants: employment and academic histories, working rights (visa status, expiry date, country of issue), driver's licence and passport details, ethnicity (optional), the names of referees, in some cases, health information. Atlas collects this information directly from you, from organisations that provide recruitment related services to Atlas, and from third parties who provide job applicants with professional or personal references; and
- Directors: information collected about directors includes name and contact details, usually for the purposes of providing third party customer support.

We also collect personal information, including names and contact details, about:

- People involved in or through organisations that we support or sponsor;
- Our suppliers. This information is collected for business-related purposes but contains some limited personal information contact details of the people that Atlas deals with;
- People who correspond with Atlas, including through our website, in which case we keep a copy of that correspondence and relevant contact details;
- People who request information updates about us through our website mailing list or email alerts service.

We collect information from the [www.atlasiron.com.au](http://www.atlasiron.com.au) site using server logs and Google Analytics. More information on Google Analytics is available at [www.google.com/analytics](http://www.google.com/analytics).

When you visit the Atlas website to read, browse or download information, your record/log your IP address (the address which identifies your computer on the internet and which is automatically recognised by our web server), date and time of your visit to Atlas' site, the pages viewed, and any information are downloaded.

This information is only used for the purpose of site analysis and to help Atlas offer you an improved online service. We may automatically collect non-personal information about you such as the type of internet browsers you use or the site from which you linked to Atlas' website. You cannot be identified from this information and it is only used to assist Atlas in providing an effective service on Atlas' website.

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#### **4 USE AND DISCLOSURE OF PERSONAL INFORMATION**

We will generally use and disclose your personal information for the purpose for which it was collected, purposes related to the main purpose for which the information was

collected, or where you have consented to the use or disclosure.

For example, we may use your personal information to assess your application for employment, to send you information about our services or provide personal information about you to service providers who assist us in providing our services. These may include organisations that assist Atlas with archival, research, mail and delivery, auditing, consulting, security or technology services.

We may otherwise use or disclose your personal information where required or authorised by law, which may include emergency situations and assisting law enforcement agencies.

We may disclose your personal information to overseas recipients (including service providers) located in such countries as New Zealand, the United States of America, Canada, the United Kingdom and China. You should be aware that overseas recipients may not be subject to privacy legislation which is as stringent as the legislation which applies in Australia.

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## **5 ACCESSING AND UPDATING YOUR PERSONAL INFORMATION**

To make a request to access or correct any personal information we hold about you, please contact us using the “Contact Details” set out below. We ask that you provide us with as much detail as you can about the particular information you seek, in order to help us retrieve it. An access fee may be charged. In certain circumstances, we may not be required by law to provide you with access or to correct your personal information. If that is the case, we will give you our reasons for that decision.

We take reasonable steps to make sure that the personal information we collect, use and disclose is accurate, complete and up-to-date.

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## **6 THIRD PARTIES WHO SUBSCRIBE TO EMAIL ALERTS**

Atlas ensures subscribers to email alerts are aware of its privacy statement prior to subscribing for the alerts.

When third parties subscribe to Atlas’ email alert service, Atlas will do the following:

- Record their e-mail address;
- Only use their e-mail address for the purpose it has been provided;
- Not add the email address to a mailing list (unless specifically requested);
- Not disclose the email address without the third party’s consent.

Users of the Atlas website should be aware that cookies may be stored on their hard drive. A 'cookie' is a short text file that may be stored on a computer's hard drive when a website is visited. When a third party accesses or views Atlas’ website, the third party is made aware that a cookie may be downloaded to their computer by an external company that provides share price details and charts for the Atlas website. These cookies may be used by Atlas to review how its website is used so that Atlas may enhance the accessibility of its website.

Atlas will not use cookies or other tracking data to circulate advertising or promotional material.

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## **7 SECURITY OF PERSONAL INFORMATION**

Typically, we will store personal information both in-house and with third party storage providers (including third party cloud service providers). Irrespective of whether

personal information is stored electronically or in hard copy form, we take reasonable steps to protect the personal information we hold from misuse, loss, destruction, unauthorised access, modification or disclosure. If stored in a cloud environment, we will take reasonable steps to ensure our continued control over the information, and to ensure that your access rights under the Privacy Act are maintained.

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## **8 CONTACT DETAILS**

If you have any questions, concerns or feedback about privacy, please contact the Company Secretary at:

Atlas Iron Limited

Address: Level 18, 300 Murray Street, Perth,  
WA 6000

Phone: 08 6228 8000

Email: [atlas@atlasiron.com.au](mailto:atlas@atlasiron.com.au)

The Company Secretary is responsible for coordinating the investigation of any concerns complaints made to Atlas about privacy issues and resolving the matter with a complainant.

We will respond to concerns and complaints within a reasonable time after receipt (usually no more than 30 days). If you remain unsatisfied with the way in which we have handled a privacy issue, we suggest you approach an independent advisor or contact the Office of the Australian Information Commissioner for guidance on alternative courses of action which may be available. We will provide our full cooperation in the event that you elect to pursue this course of action.

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

Updated by the Board: 30 July 2014