

# PRIVACY POLICY



## Introduction

Atlas Iron Pty Ltd (**Atlas**) is committed to respecting the privacy of your personal information. This policy sets out:

- how and why does Atlas collect and process your data; and
- the rights you have relating to the personal information Atlas holds about you.

In this policy:

- references to **policy** mean this privacy policy;
- references to **Atlas, we, us** or **our** mean Atlas Iron Pty Ltd of Raine Square, 300 Murray Street, Perth WA 6000 Australia, including our subsidiaries;
- the term **personal information** means any information about an identified or identifiable person, including, for example, a name or email address;
- the words **process** and **processing** mean the things Atlas does with personal information, including using, holding, disclosing, transferring, recording, storing or otherwise handling;
- the term **sensitive information** means personal information about someone's race, ethnicity, political or religious beliefs, sexual orientation, criminal record, credit score or rating, employment or tax and includes health information; and
- the term **health information** means sensitive information about someone's physical, mental or psychological health, including their abilities, health services or genetic information.

### *Purpose of this policy*

This policy sets out how Atlas deals with the personal information of job applicants, supplier representatives, customers, business partners, sponsors, landowners and stakeholders we work with or otherwise encounter to conduct our business.

## Types of personal information we collect

### *Personal information*

The personal information we may collect from you may include information that:

- identifies who you are, your job title and your date of birth;
- allows us to contact you, like your address (work or home), your telephone number and your email address;
- relates to your application to work with us, including your qualifications, employment history, interests, curriculum vitae, notes we take in an interview with you, your work visa, results of tests and background checks we may carry out (including criminal records checks);
- information about how you use our website and other hosted services, including your IP address, browser type and language, access times, operating system and location information; and
- additional information includes correspondence with you, information about your access to and departure from any Atlas site (including information captured by security cameras), and your use of Atlas' assets.

### *Sensitive information*

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We may collect sensitive information about you (including health information), but Atlas will only do so for a reason specified in this policy.

## **Why do we process personal information?**

We process personal information to conduct our business, including recruiting, managing relationships, monitoring our website, complying with laws, and operating safely.

The primary purposes for which Atlas processes personal information include:

- general business purposes, including entering into and fulfilling contracts;
- recruiting purposes, including considering job applications, carrying out background checks, and corresponding with you about job opportunities;
- managing resource planning, our workforce and internal investigations;
- working relationships with third parties;
- managing safety and security risks including by monitoring the use of Atlas' sites (including with security cameras), assets and IT systems and networks (containing by monitoring computer use) and the health of our personnel;
- managing approvals, leases and licences, and accounts and records;
- managing our relationship with you – this includes providing you with information or services, improving our products and services and communicating with you;
- marketing purposes, including collecting information about visitors to our website; and
- managing our legal obligations, including responding to requests from government agencies and concerning legal proceedings.

We may also process personal information for another purpose if you have consented to it or if there is another lawful reason for us to do so.

## *Sensitive information*

We may process your sensitive information only if you have consented to it or if there is another lawful reason for us to do so.

## *Cookies*

Atlas Iron and software services like Microsoft 365 use cookies to manage websites. If you do not wish your web browser to store cookies, you can change your browser settings to reject them.

## *Hyperlinks*

Atlas' website may include links to websites that we do not manage. We cannot control the content of other websites, and accordingly, we are not responsible for the privacy practice of those websites.

## **Whom Atlas shares personal information with**

We may share personal information with third parties that assist us in managing Atlas' business. Some third parties may be located outside of Australia.

## *Other third parties*

We may need to share your personal information (including health information) with the following:

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- recruitment agencies you have authorised to act on your behalf;
- third-party service providers to Atlas (including providers of human resources services, health and medical services, information technology services, legal services and accounting services);
- third parties, which are prospective purchasers of all or part of Atlas' business; and
- government agencies or other persons where we are required to because of a law.

## **How we store and protect your personal information**

We take steps to make sure your personal information is secure and protected against unauthorised access or use. We keep your personal information only for as long as we need it for the purposes specified in this policy.

### *Data protection*

Atlas has implemented procedures and technologies to keep your personal information secure from the point we collect it until your personal information is destroyed.

We also take steps (including implementing policies and procedures and providing training) to ensure our workers understand their obligations to protect their personal information. If we become aware of a failure by an Atlas worker to comply with relevant policies and procedures, we will investigate and take appropriate action.

### *Storing personal information*

We store your personal information in electronic databases hosted in our dedicated data centres in Australia.

We may also use third parties to process your personal information, but only if the third party enters a contract to ensure your personal information is kept secure or if they otherwise implement equivalent security measures.

### *Retaining your personal information*

We aim to hold your personal information for only what is necessary for the purposes specified in this policy or as otherwise required by law.

### *Job applicants*

If you apply for a job with Atlas but are unsuccessful, we retain your personal information for 12 months to consider you for other roles within Atlas. But we may delete your personal information anytime after an unsuccessful application.

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## Your rights and choices

### *Your rights*

You have rights relating to the personal information Atlas holds about you. Please tell us if you want to correct your personal information or if you have any concerns about how we handle your personal information.

If you wish to access, correct or update any of the personal information we hold, please get in touch with Atlas Iron at [atlas@atlasiron.com.au](mailto:atlas@atlasiron.com.au). (please ensure your email is addressed to Manager

Legal/Joint Company Secretary, Atlas Iron) or by telephone at +61 8 6228 8000 or via the [Contact us](#) form on our website.

### *Concerns or queries*

If you have a concern or query about how Atlas deals with your personal information, please get in touch with our privacy officer at the above details. We will address the matter as soon as possible.

However, if you consider we have addressed the issue inadequately, you have the right to raise it with the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)). We will do what we reasonably can to assist you.

## Updates to this policy

We will update this policy as required to reflect laws or procedure changes. We will make the latest version of this policy on our [website](#).

## Contact us

If you have a question about this policy, please get in touch with our Manager – Legal / Joint Company Secretary • Atlas Iron Pty Ltd at [atlas@atlasiron.com.au](mailto:atlas@atlasiron.com.au).

Gerhard Veldsman  
Chief Executive Officer  
Date: April 2023