

PRIVACY POLICY

This policy sets out the requirements for privacy at BUMA Australia Pty Ltd (**BUMA**) and applies to all employees and third parties engaged by BUMA.

1 Introduction

BUMA respects and upholds the privacy rights of individuals. We are sensitive to privacy issues and take seriously the ongoing trust placed in us. We have committed to compliance with the Privacy Act 1988 (Cth) (Privacy Act), including the Australian Privacy Principles (APPs), which detail how personal information may be collected, used, disclosed, stored, and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

2 Definitions

personal information is information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion, including symbolic identifiers such as citizenship and immigration status.

sensitive information, a sub-set of personal information, is information or an opinion about an individual's:

- racial or ethnic origin,
- political opinions,
- political association membership,
- religious beliefs or affiliations,
- philosophical beliefs,
- professional or trade association membership, trade union membership,
- sexual orientation or practices or
- criminal record, and
- health information and genetic information.

3 Types of personal information collected

We only collect personal information that is reasonably necessary for us to provide our services and to ensure compliance with our legislative obligations.

The types of personal information it is reasonably necessary for us to collect will vary depending on the purposes for which it is needed, for example we are required to collect more sensitive information from an employee than contractors or suppliers.

The types of personal information it may be reasonably necessary for us to collect may include:

- full name;
- street and postal address (billing address if applicable);
- email address;
- telephone number;
- date of birth;
- occupation;
- service record;
- payment information, including details of your superannuation fund;
- IP address, browser type, domain names, browsing preferences, access times and the addresses of referring websites;
- proof of identity information and documentation including driver's licence, passport or birth certificate;
- proof of income documentation; and
- next of kin and emergency contact information.

We may also collect sensitive information as part of prospective employee and contractor onboarding processes, which may include:

- medical test results; and
- gender;
- race and ethnicity.

BUMA may also collect sensitive information when legally required or otherwise permitted by law. Types of sensitive information that may be collected and held include individuals' physical and mental health information, such as medical history and details regarding treating physicians.

4 How we collect personal information

BUMA will collect personal information directly from individuals unless it is unreasonable or impracticable. If personal information is collected from a third party rather than directly from the individual concerned, and it is not clear that the individual concerned has consented to the disclosure of this information, or if such disclosure is not otherwise permitted, BUMA will if reasonably possible inform the individual that the collection has occurred and provide the reasons for it. For instance, personal information may be gathered through telephone calls, emails, website contact forms, and other communications with us.

When providing BUMA with the personal information of a third party, the third party must have obtained consent from the individual to disclose the information to BUMA.

4.1 Website cookies and information

Our website, www.buma.com.au, uses cookies—small text files that enhance user experience by remembering preferences. While most web browsers accept cookies by default, users can adjust their browser settings to decline them, which may affect website functionality. Additionally, our website automatically collects information about devices and browsing habits, including IP addresses, browser type, and domain names. This data helps us maintain and improve our website quality.

Websites linked from our website are not subject to our privacy policy. We encourage individuals to review the privacy statements of websites that link from our website.

5 How your personal information is used

We use the personal information we hold for a variety of purposes, which may include but are not limited to:

- Assessing job applications and considering candidates for employment;
- Retaining individuals as contractors;
- Evaluating potential employees or contractors through interviews;
- Engaging with prospective customers or suppliers;
- Handling complaints and conduct data analytics.; and
- Performing any other activities as permitted by law.

The following secondary activities are taken:

- Personal information may be accessed by third-party service providers like maintenance or IT during their duties.

6 Disclosure of personal information

Personal information is not disclosed to any external parties except our employees, clients, contractors, suppliers, distributors, and agents, as required in the regular course of our business activities, such as IT service management, data analysis, business reporting, research, advertising, safety incident investigation, and consultancy services, and to ensure statutory and regulatory compliance. We commit to taking all reasonable steps to ensure these parties adhere to the provisions of this Privacy Policy.

Disclosure of personal information may be necessary to:

- fulfill a legal obligation such as statutory reporting of gender information;
- enforce contract terms and conditions, or comply with legal requirements including access by employees to mine sites.
- Protect our rights, property, or safety, as well as those of our employees, customers, or others, including sharing information with other organisations or government bodies for fraud protection and credit risk reduction.

6.1 Overseas disclosure

We typically do not disclose or store personal information outside Australia. Where we do, the Privacy Act mandates that we take reasonable measures to ensure that any overseas recipient adheres to the APPs when handling such information. If an individual gives BUMA consent to disclose their personal information to overseas recipients, these precautionary measures are not required.

By providing personal information to us, it is agreed that this information may be disclosed, transferred, stored, or processed outside of Australia in a country that might not offer the same level of privacy protection. BUMA will take reasonable steps to ensure that the overseas recipient does not breach the APPs.

7 Unsolicited information

Where BUMA receives unsolicited personal information without taking active steps to collect the information, we will assess whether it could have legitimately obtained the information directly from the individual or through another process authorised under the Act in which case it may retain the information, otherwise BUMA will either destroy or de-identify the information as soon as it is lawful or reasonable to do so.

8 Direct marketing

Where an individual has directly provided BUMA with personal information (other than sensitive information), and they would reasonably expect BUMA to use or disclose the personal information for the purpose of direct marketing (i.e. communicating directly with them to promote BUMA's services) then BUMA may use or disclose the individual's Personal Information for that purpose. BUMA will ensure that any direct marketing communications sent contain a simple 'opt-out' procedure and that any 'opt-out' requests are actioned within a reasonable period.

9 Pseudonymity or anonymity

Individuals may choose not to identify themselves or may use a pseudonym when interacting with us unless it is impractical for BUMA to deal with an anonymous individual or BUMA is required under law to deal with identified individuals.

10 Security of data and information

BUMA takes all reasonable precautions to protect the security of personal information, both in physical form and digitally, ensuring it is stored in a controlled and secure environment.

We take diligent steps to protect personal information from misuse, loss, and unauthorised access, modification, or disclosure. In the event of a suspected data breach, we adhere to the Data Breach Notification scheme under the Privacy Act, which may include notifying affected individuals and the Office of the Australian Information Commissioner, depending on the circumstances.

11 Destruction and de-identification

We will retain personal information as long as it is necessary for our business operations or any other lawful purpose. Once our legal obligations to retain the information have expired and the information is no longer needed for the purpose for which it was disclosed, we will destroy or de-identify personal information in line with our data security and destruction policies and procedures.

12 Access to personal information

Individuals may request access to their personal information by contacting our Privacy Officer at the address provided below. There is no need to justify the request for access. If we possess personal information that an individual is entitled to access, we will offer access to this information in compliance with the APPs unless we have grounds to refuse access. We will take reasonable steps to give access in a way that meets the needs of the individual and BUMA.

BUMA will take reasonable steps to ensure that the personal information it uses and discloses, having regard to the purpose of the use or disclosure of the information, is accurate, up-to-date, complete, and relevant. If an individual believes their personal information held by us is incorrect, incomplete, or inaccurate, they are encouraged to request an amendment. We will update this information upon receiving suitable verification.

13 Complaints and concerns

For issues, queries, or complaints regarding the Privacy Policy, individuals are encouraged to contact the Privacy Officer. Complaints will be addressed promptly in compliance with the APP.

We take privacy concerns seriously, and efforts will be made to resolve them promptly with a satisfactory outcome for all involved parties.

Should individuals remain unsatisfied with the response to their complaint, or if further information about privacy in Australia is needed, contacting the Office of the Australian Information Commissioner at [oaic.gov.au](https://www.oaic.gov.au) is recommended.

14 Policy updates

It may be necessary for us to review and revise our Privacy Policy from time to time. An amended version will be posted on our website at www.buma.com.au.

15 Contact details

For questions or complaints regarding the treatment of privacy, please contact us in writing using the details provided below:

The Privacy Officer
Level 11, 199 Grey Street,
SOUTH BRISBANE QLD 4101
Email: privacy@buma.com.au

Colin Gilligan

CEO BUMA Australia

Endorsed: 08 August 2024