

# Policy

## (Board Approved)

## Privacy Policy

### Document Number –GOV-POL-02

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#### 1.0 Policy Statement

Stanwell Corporation Limited (Stanwell) is committed to respecting, managing and keeping confidential **personal information** and to providing clear and concise guidance on how personal information is collected, stored, used and disclosed.

#### 2.0 Scope

This policy applies to Stanwell's directors and employees and to all contractors working for or at Stanwell (our people).

#### 3.0 Purpose

This policy establishes a common understanding about how Stanwell will comply with its obligations under the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (APPs), when handling an individual's personal information. It applies to all personal information that may be collected by, or provided to, Stanwell, which includes personal information disclosed during or as a result of access to our website <http://www.stanwell.com>.

Personal information is broadly defined as '*information or an opinion (about an individual, or an individual who is reasonably identifiable), whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not*'. Personal information includes (but is not limited to) information such as:

- an individual's name and address;
- bank account details and credit card information; and
- photos.

*This policy does not apply to any aggregated or other information that may be developed internally by Stanwell, provided that this information does not identify the person in any way.*

#### 4.0 Content

*Privacy is the claim of individuals, groups, or institutions to determine for themselves when, how, and to what extent information about them is communicated to others.*

In Australia, privacy law is regulated by the *Privacy Act 1988* (Cth) (Privacy Act).

As a company with a turnover in excess of \$3 million, the Privacy Act and the associated APPs apply to Stanwell.

Relevantly, the Privacy Act and the associated APPs:

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WRITTEN BY: ..... ENDORSED/CHECKED BY: ..... APPROVED BY: ..... DATE: .....  
 NAME: Maria Maraj NAME: Michael O'Rourke NAME: Board

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Approved via Board Memorandum Number: (For Board Approved Policies Only) BD-18-03-9.1

- regulate the way Stanwell can collect, store, use and disclose personal information about individuals;
- allow individuals to access information that Stanwell may keep about them;
- allow individuals to request changes or amendments to this information; and
- establish a Notifiable Data Breach regime for the mandatory notification of eligible data breaches.

Stanwell takes the issue of personal privacy seriously, and is committed to complying with the Privacy Act and the associated APPs. The processes and practices that Stanwell has implemented to ensure that personal information is managed in an open and transparent way and in compliance with privacy obligations (see below) are set out in this [Policy](#), Stanwell's [online Privacy Policy](#) and Stanwell's Privacy Procedure:

APP 1	Open and transparent management of personal information
APP 2	Anonymity and pseudonymity
APP 3	Collection of solicited personal information
APP 4	Dealing with unsolicited personal information
APP 5	Notification of the collection of personal information
APP 6	Use or disclosure of personal information
APP 7	Direct marketing
APP 8	Cross-border disclosure of personal information
APP 9	Adoption, use or disclosure of government related identifiers
APP 10	Quality of personal information
APP 11	Security of personal information (including Notifiable Data Breaches)
APP 12	Access to personal information
APP 13	Correction of personal information

Stanwell's online Privacy Policy also serves as Stanwell's APP 5 collection statement for the online collection of personal information.

## 5.0 Responsibilities

Specific responsibilities and accountabilities for privacy are detailed below:

Position	Responsibility
Board	The Stanwell Board has ultimate accountability for this policy.
Executive General Managers	Each Executive General Manager must comply with this policy and the Privacy Procedure.  Executive General Managers are responsible for overseeing the implementation of this policy and the Privacy Procedure and making sure that they are followed.
Chief Financial Officer	The Chief Financial Officer (or his or her delegate) is responsible for overseeing Stanwell's privacy governance framework. This includes: <ul style="list-style-type: none"> <li>• from time to time, reviewing this policy, the Privacy Procedure and any changes in the law, and making recommendations regarding any necessary policy changes and implications;</li> </ul>

	<ul style="list-style-type: none"> <li>• advising the Executive Leadership Team and the Board about policy changes and implications for this policy and the Privacy Procedure;</li> <li>• giving advice, guidance and assistance about this policy and the Privacy Procedure;</li> <li>• ensuring that appropriate records are kept about every breach; and</li> <li>• overseeing the appropriate notification of any eligible data breaches.</li> </ul>
Privacy Officer	<p>The Privacy Officer is responsible for:</p> <ul style="list-style-type: none"> <li>• responding to any internal or external questions or inquiries in relation to Stanwell's privacy governance framework;</li> <li>• responding to requests from individuals to access or request information;</li> <li>• responding to requests from members of the public for a copy of Stanwell's Privacy Procedure;</li> <li>• responding to privacy complaints or breaches, including allegations of an interference with privacy;</li> <li>• in conjunction with relevant subject matter experts, undertaking internal privacy investigations to determine whether there has been an interference with privacy (including eligible data breaches); and</li> <li>• as required, undertaking privacy impact assessments and/or internal audits on information security.</li> </ul>
Managers and Supervisors	<p>Managers and Supervisors are responsible for ensuring that:</p> <ul style="list-style-type: none"> <li>• our people are aware of and adhere to this policy and the Privacy Procedure;</li> <li>• procedures for maintaining personal information are complied with; and</li> <li>• reporting all suspected breaches of privacy to the Privacy Officer and the responsible Executive General Manager.</li> </ul>
Our People	<p>Everyone at Stanwell is responsible for managing personal information in the manner required by Stanwell. Specifically, our people are required to:</p> <ul style="list-style-type: none"> <li>• comply with this policy and the Privacy Procedure;</li> <li>• ask their Supervisor or Manager if they do not understand any part of this policy or the Privacy Procedure, or if they are unsure about whether information is personal information; and</li> <li>• reporting all suspected breaches of privacy to the Privacy Officer and the responsible Executive General Manager.</li> </ul>

### Privacy Officer

Stanwell's Privacy Officer is:

Name: Maria Maraj  
 Telephone Number: 07 3335 7246  
 Facsimile Number: 07 3228 4300  
 Email Address: [privacy@stanwell.com](mailto:privacy@stanwell.com)  
 Physical Address: Level 2  
 180 Ann Street  
 Brisbane QLD 4000

## 6.0 Review, Consultation and Communication

### Review:

This document is required to be reviewed, as a minimum, every 2 years.

### Communication/Requirements after Update:

At a minimum, this policy and any subsequent updates will be communicated via GenNet. Additional communication may be coordinated by the Chief Financial Officer or his or her delegate.

This policy is available electronically.

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## 7.0 Definitions

APP	Australian Privacy Principles
Eligible Data Breach	Unauthorised access to, unauthorised disclosure of, or loss of information where a reasonable person would conclude that it is likely that an affected individual would suffer serious harm because of the breach.
Personal Information	Information or an opinion (about an individual, or an individual who is reasonably identifiable), whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not.

## 8.0 References

Australian Privacy Principles

Code of Conduct – The Way We Work at Stanwell – GOV-POL-30 (and the Code of Conduct Framework Policies)

*Privacy Act 1988* (Cth)

Privacy Procedure – GOV-PROC-41

## 9.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Endorse/Check	Approved By
0	13.09.2012	Transfer to new Stanwell template, addition of who the policy is applicable to, amended NPP 4 and 5 titles, amended Privacy Contact Officer, amended position titles to Executive General Managers, amended reviewing responsibilities and addition of review period.	Jon Windle	Rachael Warren	Michael O'Rourke
1	18.02.2014	Revised to incorporate the amendments made by the <i>Privacy Amendment (Enhancing Privacy) Act 2012 (Cth)</i> , particularly the introduction of the Australian Privacy Principles to replace the National Privacy Principles.	Maria Maraj	Michael O'Rourke	Board
2	31.03.2016	Minor amendments made including changes to position title.	Maria Maraj	Michael O'Rourke	Board
3	08.02.2018	Biennial review. Update for mandatory data breach notification requirements, and other updates to responsibilities, position titles etc.	Maria Maraj	Michael O'Rourke	Board