



NICKEL AND  
TECHNOLOGIES

ACN 627 151 080

## **Privacy Policy**

Class 1 Nickel Limited (Insert ACN 627 151 080) (and all related or subsidiary companies) (“Class 1 Nickel Limited, “we”, “us”) is committed to maintaining the security of all Personal Information provided to Class 1 Nickel Limited, whether by individuals with whom we do business, visitors to and users of our websites or otherwise. This Privacy Policy details how we collect, use and manage this personal information.

We have adopted the National Privacy Principles (NPPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Federal Privacy Commissioner at [www.privacy.gov.au](http://www.privacy.gov.au).

## **What is Personal Information and whose information do we collect?**

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include names, addresses, email addresses, phone and facsimile numbers.

Class 1 Nickel Limited collects Personal Information from a range of individuals in the context of its day to day business activities, including Personal Information from:

- users of the Class 1 Nickel Limited website;
- industry association representatives;
- representatives of our suppliers, contractors, customers and business partners;
- job applicants; and
- landowners.

## **How we collect Personal Information**

This Personal Information is obtained in many ways including correspondence, by telephone and facsimile, by email, via our [website](#), from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policies of authorised third parties.

## **How we use your Personal Information**

### **Using our website**

When you use our website, Class 1 Nickel Limited collects certain basic information that is sent by your browser to our website. This includes information such as your IP address, browser type, operating system, language, time zone setting, access times and any referring website addresses.

We use various technologies including cookies, internet tags, web beacons and logs in order to improve and manage our site. We do not use them to serve adverts or other promotional materials. Class 1 Nickel Limited may use and combine such passively collected information to improve our website, customise it based on your preferences, compile and analyse statistics and trends and otherwise administer and improve our website for your use. Class 1 Nickel Limited may also disclose this de-identified information to third parties.

### **Job applications**

Class 1 Nickel Limited may collect a range of information in a business context, such as your name, gender, job title, photographic identification, email address, home address and other contact details, details of your business and other interests, experience and/or academic and professional qualifications,

third party references, communications with you (including notes from meetings), financial and payment information, and information collected from clearance questionnaires and/or interviews.

### **Business uses**

Class 1 Nickel Limited uses information collected from you for business-related purposes, including negotiating, concluding and performing contracts, administering real estate leases and licences, recruitment, conducting clearance procedures, managing accounts and records, communicating with you and third-party contacts, supporting corporate social responsibility activities, legal, regulatory and internal investigations and debt administration.

### **Sensitive Information**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or
- Where required or authorised by law.

### **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

### **Disclosure of Personal Information**

Your Personal Information may be disclosed in a number of circumstances including the following:

- To related companies of Class 1 Nickel Limited
- To third parties appointed by Class 1 Nickel Limited, including our professional advisors, accountants, insurers, lawyers, auditors, contractors, website and data hosting providers, technology service providers, advertising partners and persons who perform services to us (in which case Class 1 Nickel Limited uses reasonable steps to ensure such third parties keep your Personal Information confidential and do not use or disclose your Personal Information for any purpose other than the purpose of providing those services to us)
- Where you have consented, to carefully selected third party partners so that they may inform you of offers, promotions, products and services

- In the unlikely event that Class 1 Nickel Limited or its assets are or may be acquired by a third party, Personal Information may be provided to that third party and their advisors
- Third parties where you consent to the use or disclosure
- Where required or authorised by law

## **Security of Personal Information**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## **Accessing your Personal Information**

You may access the Personal Information we hold about you to update and/or correct it, subject to certain exceptions. In most cases, a summary of your personal information will be freely available to you by contacting our Privacy Officer (details below). For more detailed requests for access to personal information (for example, access to information held in archives) Class 1 Nickel Limited may charge a fee to cover the cost of retrieval and the supply of this information to you.

All requests for access to personal information will be handled as quickly as possible and we will endeavour to process any request for access within 30 days after receiving it. Some requests for access may take longer depending upon the nature of the personal information being sought. Please note that we are not always required to provide you with access to your personal information on request. If we deny your request for access to your Personal Information, we will explain why.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

## **Maintaining the Quality of your Personal Information**

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## **Links provided on our website**

This website contains links to other Class 1 Nickel Limited and third-party websites. Before disclosing your personal information on any other website, we advise you to examine the privacy statements of those websites. Class 1 Nickel Limited takes no responsibility for the privacy practices or the content of any websites other than this one.

## **Policy Updates**

This Policy may change from time to time and is available on our website.

## Privacy Policy Complaints and Enquiries

If you have any questions or concerns about Class 1 Nickel Limited's collection, use or disclosure of personal information, or if you believe that Class 1 Nickel Limited has not complied with this Privacy Policy or the Act, please **contact us** (our Privacy's Officer's details are provided below). When contacting us, please provide as much detail as possible in relation to the query, issue or complaint. Your complaints are taken seriously and will be assessed with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with relevant information we may require.

Class 1 Nickel Limited 's Privacy Officer will review your complaint and contact you if they require further information regarding your complaint. Reasonable endeavours will be made to ensure your complaint is reviewed and resolved within 30 days of receipt and otherwise in accordance with the Act. Resolution of your complaint may be delayed if we are unable to contact you.

If Class 1 Nickel Limited's Privacy Officer is not able to resolve your complaint, or if you are not happy with the explanation or resolution proposed, you may request that your complaint be escalated internally within Class 1 Nickel Limited to an appropriate person for further assessment (the "Manager"). The Manager will review your complaint and may, if they deem appropriate, propose an alternative resolution or suggest that you pursue alternative avenues for your complaint. The Manager may also contact you to attempt to resolve your complaint or to seek additional information.

The Manager will use reasonable endeavours to review your complaint within 30 days of your referral and otherwise in accordance with the Act. Resolution of your complaint may be delayed if we are unable to contact you.

If you are not satisfied with an outcome following the above process, you may wish to speak to the Office of the Australian Information Commissioner (they can be contacted via email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)).

## Contact us

For any queries or complaints, please [email](#) Class 1 Nickel Limited's Privacy Officer.