

## PRIVACY POLICY

### 1. INTRODUCTION

Hawsons Iron Ltd ABN 63 095 117 981 (**Hawsons, we, us or our**) is committed to respecting people's privacy and is bound by the Australian Privacy Principles in the *Privacy Act 1988* (Cth) (**Privacy Act**), as well as other applicable laws protecting privacy. All personal information that Hawsons handles is managed in accordance with those laws.

This Privacy Policy applies to Hawsons and each of its wholly owned subsidiaries or Joint Venture activities. It outlines how we collect, use, disclose and protect personal information, as required by the Privacy Act. It also outlines how you can access and correct your information, ask a question or make a complaint.

This Privacy Policy does not cover the personal information of our employees.

### 2. COLLECTING PERSONAL INFORMATION

#### 2.1 WHAT IS PERSONAL INFORMATION?

Personal information is information that identifies you as an individual or from which your identity can be reasonably identified.

The types of personal information we may collect includes, but is not limited to, your:

- name;
- address;
- email address;
- telephone or fax number;
- date of birth; and / or
- other information of a personal nature disclosed to us during communications, whether in person, over the telephone, via email or in writing.

#### 2.2 WHAT IS THE PURPOSE FOR COLLECTING PERSONAL INFORMATION?

We collect personal information for purposes relating to our business functions and activities.

Hawsons collects personal information about individuals who are contracted to, or employed by, Hawsons' suppliers (including third party service providers) and customers, and their related companies and agents. This information may include an individual's name, contact details and other information necessary for Hawsons to conduct business with that person or their organisation.

Hawsons may also collect personal information about individuals within the communities in which it operates. For example, Hawsons may collect personal information from its suppliers or contractors for the purposes of engaging for the supply of goods and/or services, as well as ongoing relationship management.

Hawsons may also collect personal information from individuals visiting a Hawsons site, its retail shareholders, individuals associated with its institutional shareholders, and job / contract applicants. This list is not exhaustive and Hawsons may be required to collect personal information from other individuals

from time to time, during the course of its operations.

## **2.3 HOW DO WE COLLECT PERSONAL INFORMATION?**

We may collect your personal information through different means, including as set out below:

### *(a) Directly from you*

We may do this when we meet you in person, such as when you complete an application form or contract, but we may also collect personal information in other ways, including when:

- we have a conversation with you over the telephone;
- you send an email or letter to us;
- you complete an enquiry or form or subscribe to investor updates via our website; or
- you submit a tender.

### *(b) Indirectly*

We may also collect personal information from third parties. This may include collecting personal information from public sources, our related companies, introducers or information service providers.

### *(c) From our website*

If you access our website, you will browse anonymously (unless you have completed an online application form), except as set out in this section.

For all visitors browsing our website, we may use cookies to collect information such as the server your computer is logged on to, your browser type, the time of visit, pages visited and your IP address. We may also derive the general geographic area associated with an IP address.

Information collected in this way is not capable on its own of personally identifying you.

If you have provided us with personal information by completing a form online and we have identified you, it may be possible for us to link your identity to your previously anonymous browsing history and collect information about your possible future use of our websites, irrespective of how you access our sites (e.g., by clicking a link in an advertisement or from a third-party website).

If you would prefer not to be identified in this way, you should delete the cookies and reconfigure the cookie preferences on your internet browser.

## **3. HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION**

### **3.1 WITHIN AUSTRALIA**

We collect, hold, use and disclose personal information to process applications and payments, verify identities and other details, manage our business dealings (including by monitoring, auditing and maintaining accurate records), protect our lawful interests and deal with any enquiries and concerns.

To do this, we may disclose personal information to third parties who:

- provide services which are necessary for us to conduct our business, such as providers of archival, auditing, debt collection, banking, insurance, marketing, advertising, valuation, mail house, delivery, recruitment, technology, data processing, research, investigation, professional advisory (legal, accounting, financial and business consulting) and security services;



- are regulatory bodies, government agencies, law enforcement bodies, courts and dispute resolution schemes; or
- are your authorised agents, executors, administrators or legal representatives.

We may also hold, use and disclose personal information in connection with suspected fraud, misconduct and unlawfulness, and as part of acquisitions or potential acquisitions of our business.

On some occasions, we may be obliged to disclose your personal information by law, e.g., court order or statutory notices pursuant to any legislation and to government authorities.

### **3.2 OUTSIDE OF AUSTRALIA**

Hawsons is based in Australia, so personal information will be processed in Australia, however there may be instances where personal information is sent to organisations or persons located overseas. For example, indirect overseas disclosure of personal information to third parties overseas may occur as we use third party data service and storage entities located overseas. If personal information is disclosed to a third party in a country that does not have the equivalent privacy laws as Australia, we will take all reasonable steps to ensure that the overseas recipient does not breach the Privacy Act.

Hawsons will not send personal information overseas unless either:

- we reasonably believe that the recipient of the personal information is subject to laws that have the effect of protecting personal information in a way that, overall, is substantially similar to the way in which the Privacy Act protects personal information, and there are mechanisms that can be accessed to enforce the protection of those laws; or
- you have consented to the disclosure of personal information to an overseas recipient.

## **4. KEEPING PERSONAL INFORMATION SECURE**

We use security procedures and technology to protect the personal information that we hold in electronic and hard copy format.

Hawsons implements a number of physical and electronic measures to protect personal information. We restrict access to our physical and electronic databases, maintain firewalls, lock cabinets, maintain authority level protocols and encrypt certain data where practicable to do so. Information stored on our computer systems can only be accessed by staff entrusted with authority and access passwords.

We advise however, that the internet is not a secure environment and although all care is taken, Hawsons cannot guarantee the security of information provided to it via electronic means.

## **5. ACCESS AND CORRECTION OF PERSONAL INFORMATION**

### **5.1 ACCESS**

You may access the personal information we hold about you, by making a written request by email or letter, or verbal request by telephone. Please use the contact details in section 6 when making a request.

We will need to validate the identity of anyone making an access request, to ensure that we do not provide your information to anyone who does not have the right to access that information.



Your rights to access your personal information are subject to some limitations. For example, we do not have to provide you with access to the extent that it would be illegal to do so, if it would have an unreasonable effect on the privacy of others or the request is frivolous or vexatious.

We do not usually charge you for access to your personal information, however if the request is complex, we may charge you the cost of providing the access, such as staff costs of locating and collating information or copying costs.

## 5.2 CORRECTION

If you feel that the personal information relating to you that we hold is incorrect, you may contact us to request a correction. Please use the contact details in section 6 when making a request.

We will need to validate the identity of anyone making a correction request, to ensure that we do not correct the information of anyone who does not have the right to request such a correction.

There will be no cost to you for a correction of any personal information held by us.

## 6. COMPLAINTS

If you believe that we have not complied with our obligations relating to your personal information, please contact our Privacy Officer as follows:

### BY PHONE:

Call (07) 3220 2022 between 8:30am and 5:00pm (AEST) Monday to Friday.

### BY MAIL:

Mail your written complaint to:

The Privacy Officer  
Hawsons Iron Ltd  
PO Box 10919  
Level 21 | 12 Creek Street  
BRISBANE QLD 4000

### BY EMAIL:

Send an email at any time to [privacy@hawsons.com.au](mailto:privacy@hawsons.com.au)

All complaints will be investigated by an appropriately qualified representative of Hawsons and we will endeavour to resolve your complaint as quickly as possible, and in any event, within 30 days from the date the complaint was made. We will notify you of the outcome of the investigation, including how we propose to resolve your complaint and what, if any, corrective measures we will implement.

If you are not satisfied with the way your complaint was handled by us, you may lodge a complaint with the Office of the Australian Commissioner (OAIC). For more information about this, please visit <https://www.oaic.gov.au/privacy/privacy-complaints>



## 7. UPDATES

We may review and amend this Privacy Policy from time to time to address changes to laws and to reflect our current operations and practices.

You can obtain a copy of the current version at [www.hawsons.com.au](http://www.hawsons.com.au) or on request to the Privacy Officer.

**CURRENT AS AT MARCH 2022**

