

## PURPOSE

Northern Star Resources Limited's (Northern Star) approach to Privacy is derived from our Code of Conduct, namely that we treat each other with respect and dignity, and we respect the law and act accordingly. This policy outlines how we respect everyone's privacy and comply with the law. In Australia, the legal standards applicable to Northern Star are specified in the Australian Privacy Principles (APPs). The APPs are contained in the Privacy Act 1988 (the Act). The Act takes precedence over this policy should any inconsistency arise from time to time.

This policy covers the following areas:

- information collected:
- use and disclosure of information:
- out of hours contact details;
- accessing and updating information;
- security; and
- recruitment.

#### 2. INFORMATION COLLECTED

Northern Star will only collect personal information which is reasonably necessary for Northern Star to conduct its businesses. As Northern Star is a company with many locations (including the United States), it may disclose personal information to related bodies corporate in Australia and the United States to conduct its businesses. Northern Star will not collect sensitive information other than in accordance with the APPs.

Sensitive information is information on an individual's: racial or ethnic origin, political membership, membership of a professional trade association or trade union, religion or philosophical beliefs, sexual preference, health information or criminal records.

Northern Star collects and holds information in relation to employees, visitors and contractors for a variety of reasons, enabling us to meet our obligations under legislation, contract of employment, and safety. This information includes:

- information relating to the personal background such as home address, sex, date of birth, employment history, tax file number, qualifications and licences, employment history, emergency contact details, pre-employment records (i.e. pre-employment medicals, interview notes, reference checking); and
- information documenting Northern Star work history such as contract of employment, payroll records, bank and superannuation account details, salary history, performance reviews, induction and training records, personal issues, leave applications and records.

Northern Star collects and holds information in written form, electronically and in hard copy, within its network, systems and at its premises.

#### 3. USE AND DISCLOSURE

Northern Star will obtain your consent to use or disclose:

- sensitive personal information where it intends to use or disclose this information for a different purpose to the purpose it was collected or a purpose not directly related to the purpose it was collected; and
- personal information where it intends to use or disclose this information for a different purpose to the purpose it was collected or a purpose not related to the purpose it was collected.
- Northern Star may disclose sensitive information or personal information to authorised third parties, such as, but not limited to, OccuMed and Red Earth Health Solutions, for the purposes of occupational health and safety injury management or reasons related to an employee's health and safety. Northern Star will obtain an employee's consent to such disclosure, unless an exception or exemption applies as set out in clause 4 below. The Injury Management Standard specifies which employees have access to injury management information for the purposes of their roles.

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## 4. EXCEPTIONS / EXEMPTIONS

Despite clauses 2 and 3 above, Northern Star may collect, use and disclose sensitive information and/or personal information without your consent where permitted by the Act, for instance, in a state of emergency, where information is required by an enforcement body and/or is related to unlawful activity or misconduct.

In respect of enforcement bodies, Northern Star may be requested or required by the police or mines safety regulator to provide sensitive information and/or personal information as part of an investigation or the implementation of border controls.

Northern Star may seek your consent to the collection, use and/or disclosure of your sensitive information and/or personal information where it is not required to by the Act, but Northern Star reserves the right not to seek your consent where your consent is not required by the Act.

Northern Star may seek your consent to the collection, use and/or disclosure of your sensitive information and/or personal information on behalf of an enforcement body.

# 5. OUT OF HOURS CONTACT DETAILS

Northern Star is a business which in the event of an emergency, may need to urgently contact key people out of hours (e.g. damage due to severe weather, emergency evacuations etc). If you are identified as a key person, you will be provided with a mobile phone and advised if you are required to be available out of hours in case of emergency. That mobile phone number will be made available to selected people at sites and local authorities as a person to contact in case of emergency.

If you consider your privacy has been breached by any person who has access to your out of hours contact details, you are to advise the Company Secretary immediately so that steps can be taken to protect your privacy. An investigation will then be commenced without delay so that the appropriate disciplinary action can be taken against any offenders.

## 6. ACCESSING AND UPDATING INFORMATION

Northern Star will be open with respect to privacy issues and where appropriate provide access to personal information. Northern Star will correct any inaccurate, outdated, incomplete, irrelevant and/or misleading personal information held at the request of the relevant individual. Northern Star will also take all steps as are reasonable in the circumstances to ensure that the personal information collected, and used, is accurate, up to date and complete. Northern Star reserves the right to verify an individual's identity before providing any personal information.

Access will not be provided where:

- the consequences will have an unreasonable privacy impact on others;
- the request is frivolous;
- there are existing legal proceedings;
- providing access is unlawful or prejudicial to law enforcement; and
- Northern star determines that access is not required by the Act.

# 7. SECURITY

Northern Star will:

- take reasonable steps to protect personal information;
- protect personal information it holds from misuse, loss and from unauthorised access, modification or disclosure;
- not use identifiers assigned by Government agencies (eg. tax file numbers);
- where lawful and practicable, respect the anonymity of an individual if requested;
- only transfer personal information to foreign countries after taking such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs, or which have at least equivalent privacy protection and where the individual has access to mechanisms to enforce that privacy protection;
- ensure all contractual arrangements with third parties adequately address privacy issues; and
- securely destroy personal information where it is no longer required and isn't required to be held by law.

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## 8. RECRUITMENT

As part of the recruitment process, Northern Star will collect personal and sensitive information from candidates for assessing the person's fit with a role. Northern Star will comply with the APPs in respect of all details obtained through the recruitment process.

Information is collected from a number of sources during recruitment:

- candidates' resumes;
- application forms;
- pre-employment medical examinations;
- police checks;
- reference checking;
- interview notes; and
- psychological profiling.

Candidates have the right to access the results of pre-employment examinations and psychological profiles. In the case of an untoward result from a pre-employment medical, the candidate will have the option of accessing the result through a GP or through a consultation with the examining doctor.

Northern Star will not disclose this information for any purpose other than for which it was collected unless the person consents beforehand or the secondary purpose is directly related to the primary purpose and a person would reasonably expect such use or disclosure.

Information collected will form the basis of the new hire's personal file. The only people who will have access to candidate information will be:

- HR:
- the hiring supervisor or manager;
- site safety professionals;
- administrative staff in connection with processing of police checks; and
- any relevant third parties (e.g. pre-employment medical examiner).

# 8.1 Unsuccessful Applicants

Information on unsuccessful candidates will be securely destroyed when:

- a decision is made not to proceed with filling the job; or
- the new hire starts with Northern Star.

# 8.2 Requesting Access and Raising Concerns

You can contact the Company Secretary at <u>compliance@nsrltd.com</u> regarding any access requests or concerns that you have about a breach of privacy.

In relation to an alleged breach of privacy, Northern Star will investigate the alleged breach of privacy and will advise you of the outcome of the investigation and any remedial action required to address any breach that is established.

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