



## INDEPENDENCE GROUP NL: IGO GROUP GOVERNANCE STANDARD 3 – PRIVACY STANDARD

Original adoption: 27 March 2015

Last review: 26 April 2018

Last amendment: 21 April 2017

### 1. PURPOSE

Independence Group NL (**IGO or the Company**) and IGO group companies (**the Group**) are committed to respecting the privacy of Personal Information of any individuals who deal with IGO. “**Personal Information**” is information or an opinion about an individual or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

### 2. PERSONS TO WHOM THIS STANDARD APPLIES

This Standard applies to all directors, and full-time, part-time and casual employees of the Group and any other individual that IGO may collect personal information from.

### 3. RESPONSIBILITIES

#### APPLICATION OF PRIVACY LAWS

IGO is bound by the Australian Privacy Principles under the Privacy Act 1988 (Cth) (as amended or superseded) and other applicable Commonwealth and State laws which protect privacy. Any permitted handling of Personal Information under exemptions under these laws will take priority over this Standard to the extent of any inconsistency.

#### PERSONAL INFORMATION COLLECTED

IGO only collects Personal Information that is necessary for its functions and activities.

IGO may collect Personal Information from a customer, agent, supplier, contractor, adviser, financier, joint venture partner or business partner, an employee of the above mentioned entities, or an individual who contacts IGO, uses the IGO website or applies for securities. IGO may also collect other Personal Information for the purposes of matters connected with its relationship with a person or their employer, including, but not limited to, providing information on services, carrying out transactions and engaging under commercial terms. IGO may also collect Personal Information if you work for or with IGO, for payroll, superannuation, health and safety, administration, security, insurance, staff management and contact purposes. If an individual applies for a position with IGO, it may collect information about experience, character, qualifications and medical conditions, and do screening checks. IGO collect, use and disclose Personal Information to assess an application, conduct screening checks and contact someone about other positions. In certain circumstances IGO may collect sensitive information such as criminal record and medical information with consent or otherwise in accordance with the law.



Generally, IGO tries to collect Personal Information directly, however, there are certain situations in which it may collect personal information indirectly. In either case, IGO will take reasonable steps to ensure the person is aware of the purposes for which the information is collected.

**Email alerts:** IGO ensures subscribers to email alerts are aware of the IGO privacy statement prior to subscribing. When third parties subscribe to IGO's email alert service, IGO records their e-mail address.

**Cookies:** Users of the IGO website should be aware that cookies may be stored on their computer ("computers" includes personal computers, laptops, smart tablets and smart phones). A 'cookie' is a short text file that may be stored on a computer when a website is visited. When a third party accesses or views IGO's website, the third party is made aware that a cookie may be downloaded to their computer by an external company that provides share price details and charts for the IGO website. These cookies do not collect or track any personal data or information about individuals, however may be used by IGO to review how its website is used so that IGO may enhance the accessibility of its website. IGO will not use cookies or other tracking data to circulate advertising or promotional material.

## USE AND DISCLOSURE OF PERSONAL INFORMATION

IGO will generally use and disclose Personal Information for purposes related to the main purpose for which the information was collected, or where there is consent to the use or disclosure or where required or authorised by law or court order, which may include emergency situations and assisting law enforcement agencies.

When third parties subscribe to IGO's email alert service, IGO will only use their email address for the purpose it has been provided, not add the email address to a mailing list (unless specifically requested) and not disclose the email address without the third party's consent.

IGO may provide Personal Information to contractors and service providers, including organisations that assist IGO with archival, auditing, accounting, customer contact, legal, business consulting, banking, payment, debt collection, delivery, data processing, data analysis, information broking, research, investigation, insurance, website or technology services, Government authorities, regulators, advisers, printers, mail house and registries and where required by law, policy or the rules of a securities exchange, and in the case of staff, to health service providers and other representatives including unions and legal advisers and parties involved in the purchase or potential purchase of all or part of IGO's business. Some of these third parties may be located in other countries in which IGO operates. While those third parties will often be subject to confidentiality or privacy obligations, they may not always follow the particular requirements or procedures under Australian privacy laws. However, IGO will take reasonable steps to ensure that any overseas third party recipient handles the personal information in a way that generally complies with Australian privacy laws.

## ACCESSING AND UPDATING PERSONAL INFORMATION

IGO takes reasonable steps to make sure that the Personal Information it collects, uses and discloses is accurate, complete and up-to-date.

To make a request to access or correct any Personal Information IGO holds, or to raise any privacy concerns, please use the contact details below. IGO asks that as much detail as



possible is provided with a request and notes that IGO may need to verify the identity of someone making a request. IGO may not be required by law to provide access or to correct Personal Information. If that is the case, reasons for that decision will be given.

### SECURITY OF PERSONAL INFORMATION

Irrespective of whether Personal Information is stored electronically or in hard copy form, IGO takes reasonable steps to protect the Personal Information from misuse, loss, destruction, unauthorised access, modification or disclosure. As far as permissible under the law, IGO accepts no responsibility for unauthorised access to personal information held by IGO.

If you have any questions, concerns or feedback about this Standard, you should contact the Company Secretary at: Independence Group NL, PO Box 496, South Perth, WA 6951.

Phone: 08 9238 8300      Email: [contact@igo.com.au](mailto:contact@igo.com.au), Attention: the Company Secretary

This Standard will be reviewed annually by the IGO Board of Directors.