

## **Purpose and Scope**

This Policy is about the management of personal information by Cooper Energy.

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## 1. Overview

This Policy applies to Cooper Energy Limited and all of its subsidiaries (**Cooper Energy**).

Cooper Energy is bound by the Privacy Act 1988 (Commonwealth) and the Australian Privacy Principles that are contained in that Act, and is committed to protecting the privacy of personal information collected and held by it.

“Personal information” is information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or not and whether the information or opinion is recorded in a material form or not.

### 1.1. Roles and Responsibilities

Roles	Accountability
<b>General Counsel &amp; Company Secretary</b>	<b>Document Owner</b> – accountable for defining the requirements of the business process described by this procedure, ensuring appropriate performance metrics are defined and reviewed, tracking lessons learned, and driving continuous improvement.
<b>Managing Director</b>	<b>Accountable for ensuring this procedure is implemented.</b>

### 1.2. Related Content

- Privacy Act 1988 (Commonwealth)
- Australian Privacy Principles that are contained in the Privacy Act 1988 (Commonwealth)

## 2. Terms of Reference

### 2.1. The Kinds of Personal Information that Cooper Energy May Collect and Hold

Cooper Energy will only collect and hold personal information which is reasonably necessary for one or more of Cooper Energy's functions or activities, or to comply with law. For example:

- collecting personal information from shareholders for the purposes of enabling proper records to be kept and for reporting purposes;
- collecting personal information from individuals who enter into service agreements, joint venture agreements or other transactions with Cooper Energy for the purpose of administering those agreements or transactions or for reporting purposes;
- collecting personal information from Cooper Energy employees for the purposes of enabling proper employment records to be kept or from prospective employees or contractors for the purposes of conducting employment reference or criminal history checks and educational and verification of professional qualifications;
- collecting personal information from Cooper Energy employees and contractors, and visitors to our sites, to assist us in protecting the health and safety of employees, contractors, and visitors to our sites; and
- collecting personal information you voluntarily provide to Cooper Energy through the "Contact Us" webpage on the Cooper Energy website for the purpose of responding to your query.

The specific kinds of personal information collected and held will depend on the circumstances. In some circumstances Cooper Energy will collect sensitive information which includes health information. Examples of the kinds of personal information Cooper Energy may collect and hold include:

- name;
- address;
- phone number;
- fax number;
- email address;
- health information; and
- bank account information.

### 2.2. How Cooper Energy Collects and Holds Personal Information

Cooper Energy may collect personal information in a variety of ways, including when you interact with Cooper Energy in person or electronically, for example when you access the Cooper Energy website.

Cooper Energy will collect personal information about you only from you unless it is unreasonable or impractical to do so.

Circumstances in which Cooper Energy may collect personal information about you from someone else include:

- collecting personal information from a contracting company or via third party service providers (for example, Cooper Energy's share registry service provider or recruitment service providers providing services to Cooper Energy); or
- receiving third party personal information from Cooper Energy's employees and contractors, such as emergency contacts (e.g., next of kin).

If Cooper Energy collects personal information about you from someone else, Cooper Energy will take reasonable steps to ensure that you are aware that Cooper Energy has collected the information.

At or before, or if that is not practicable, as soon as practicable after, the time that the personal information about you is collected, Cooper Energy will take reasonable steps to ensure that you are aware of the matters required by the Australian Privacy Principles, including:

- why the personal information is being collected;
- who else the personal information might be given to;
- that this Policy contains information about how you are able to gain access to and correction of the information collected; and
- how to contact Cooper Energy, including how to make a complaint.

Personal information may be held by Cooper Energy in hard copy or electronically or both. Cooper Energy implements physical and electronic measures to protect personal information. Cooper Energy will take reasonable steps to ensure that the personal information that it holds is protected from misuse, interference, and loss and from unauthorised access, modification, use and disclosure (a **data breach**). Despite these steps and measures, a data breach may occur. Cooper Energy has procedures in place which are implemented by Cooper Energy personnel if they become aware of an actual or suspected data breach.

## 2.3. The Purposes for which Cooper Energy Collects, Holds, Uses and Discloses Personal Information

Cooper Energy will only use or disclose personal information which has been collected and is held by it for:

- the purpose for which it was collected;
- any related purpose for which it would reasonably be expected to be used or disclosed;
- a purpose required or permitted by law; or
- a purpose for which the individual has provided consent.

Examples of instances where Cooper Energy may disclose personal information to third parties include disclosure to providers of services to Cooper Energy, government agencies, regulatory authorities, related bodies corporate of Cooper Energy, joint venture parties, anyone to whom Cooper Energy's assets or business (or any part of it) is transferred, agents and professional advisers of Cooper Energy or where you have consented to the disclosure.

Cooper Energy requires its service providers to keep personal information confidential and not use it for any purpose other than performing those services.

Under privacy law, there are certain circumstances in which Cooper Energy will be exempt from complying with the requirements of the Privacy Act when handling personal information (for example, when Cooper Energy handles current and past employee records for something that is directly related to the employment relationship).

Cooper Energy is unlikely to disclose personal information to overseas recipients. However, as Cooper Energy has subsidiaries in other countries, it is possible that Cooper Energy may disclose information to recipients that are located outside Australia.

Cooper Energy will take reasonable steps to ensure that the personal information that is collected, used, or disclosed by it is accurate, up to date, complete and relevant.

Cooper Energy will also take reasonable steps to ensure that personal information it holds that is no longer necessary for the disclosed purpose is destroyed or permanently de-identified, subject to any legal obligation to keep the personal information for any required period of time.

## 2.4. Website Cookies and Third-Party Websites

Cooper Energy's website may use cookies for site administration purposes. For example, cookies may be used to collect information about your visit to the website, such as your Internet protocol (IP) address, how you arrived at the website (for example, through a search engine or a link from another website) and how you navigate within the website. No personal information is obtained.

This information is collected in order to compile statistics about the patterns of usage of visitors to the website which can be used by Cooper Energy to provide improved service and content based on user site traffic patterns.

If for any reason you do not wish to take advantage of cookies, you may block or disable the cookies (if you do so, you may not be able to use certain features and functions of Cooper Energy's website).

Websites that may be accessible via hyperlinks from the Cooper Energy website are owned and operated by third parties and are not subject to this Protocol. Cooper Energy has no control over the content of those websites. You should review the privacy policy of each individual website you access before you use these websites.

## 2.5. How You Can Access and Correct Personal Information About You that is Held by Cooper Energy

At your request, Cooper Energy will, in most circumstances, provide you with access to any personal information that is being held by Cooper Energy about you, although there are certain circumstances where Cooper Energy will not provide such access in accordance with the Privacy Act.

These circumstances include where providing access would have an unreasonable impact on the privacy of others, where providing access would reveal commercially sensitive information about Cooper Energy or where providing access would be unlawful.

You can seek access to, and update or correct, any personal information that is being held by Cooper Energy about you by contacting the Company Secretary at:

Email: customerservice@cooperenergy.com.au  
Telephone: +61 8 8100 4900  
Mail: GPO Box 1819  
Adelaide SA 5001

## 2.6. How You Can Make a Complaint

If you have any concern, query, or complaint about:

- any personal information about you that may have been collected, held, used, or disclosed by Cooper Energy; or;
- a breach by Cooper Energy of the Australian Privacy Principles,

please refer it to the Company Secretary using the contact details noted above.

Cooper Energy takes complaints very seriously and will respond to you shortly after receiving written notice of your complaint.

If you are concerned about the way in which your request or complaint is handled, you can contact the Office of the Australia Information Commissioner using the contact details on <https://www.oaic.gov.au/>

## 2.7. Review

From time to time Cooper Energy reviews and revises its policies. Accordingly, Cooper Energy reserves the right to change this Policy at any time.