

# **Privacy Policy**

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Revision: 1

This Privacy Policy explains how Senex Energy Limited group (Senex, we or us) collect and handle personal information from holders of our shares and securities, our employees and potential employees, and our other stakeholders – such as traditional owners, landholders, joint venturers, contractors, suppliers and other persons with whom we interact with.

The Policy describes generally the types of personal information we hold, how it is collected, held, used and disclosed and our purpose in doing so.

Senex is bound by the *Privacy Act 1988* (Cth) (**Act**) and the Australian Privacy Principles that are contained in that Act.

## 1. Why do we collect personal information and what information do we collect?

We collect personal information for a range of purposes, including:

- to manage our relationship with you;
- to comply with our legal and regulatory obligations; and
- for other purposes which you have provided your consent (e.g. subscribing to Senex press releases).

The type of personal information we collect varies depending on your relationship with us. Some examples of the information we collect are set out in the separate sections below.

We do not sell or rent to, or trade with, any third party the personal information we hold.

#### 2. Holders of our shares or other securities

If you hold our shares or other securities, the Corporations Act requires us to collect information about your name, your address and your holding. We include these details in our securities register, which is held and maintained on our behalf by Computershare Investor Services, a registry services provider. We will continue to include this information in our securities register for seven years after you cease to hold the shares or securities.

The Corporations Act also allows anyone to inspect our securities register on request and, under certain circumstances, to obtain a copy. We may provide information from the securities register to meet specific requests or requirements, such as identifying our top 20 shareholders.

As a securities holder, you may also provide your tax file number or financial institution account details to us, and our share registry may collect personal information about you in addition to the information we are required to keep under the Corporations Act, such as your legal name and other names you may be known by, your residential street address, other means of contacting you, and your date of birth. Our share registry may also hold documents in order to verify your identity. This information is generally not included in the public register and is restricted to authorised share registry employees, Senex and government regulators.

#### 3. Our employees and potential employees

### a) Job applicants

If you apply for a position with us, we will ask you to provide specific personal information, such as your name, a means of contacting you, such as your email address and telephone number, your qualifications and career history. We may also ask you for other information such as your interests and the positions you are interested in.

Any personal information you give us in connection with a job application may be used to consider you for current and future employment and may be disclosed to our external advisors to assist us in the selection and recruitment process.

# b) Employees

If you are an employee of Senex, we will collect employee records and personnel files, referee reports and other information. The handling of your personal information as an employee is exempt from the Act if it is directly related to your current or former employment relationship or an employee record relating to you. We will not disclose your personal information for any other purpose, other than as required by law.

## 4. Our other stakeholders

If you are a stakeholder such as a landholder, joint venturer, contractor, supplier or other person with whom we interact with, we may ask you to provide specific personal information such as your name, address, business credentials and financial institution details. We may also ask for other personal information if required, depending on the circumstances. We may use any personal information you provide for the purpose for which it is collected, including compliance with our legal and regulatory obligations. We will not disclose your personal information for any other purpose, other than as required by law.

# 5. Collection of information

# a) How do we collect personal information?

We may collect personal information in a number of ways, including:

- from a joint holder or authorised representative in respect of your Senex securities;
- from a credit reporting agency or a third party;
- from you directly, eg through our website, by telephone, through written correspondence (such as a letter or email), or in person if you visit our share registry;
- from publicly available sources of information, such as address validation software and telephone directories; or
- by monitoring or recording a call that you make to us in certain circumstances (we will notify you beforehand).

# b) Information collected through our website

Some of the information that we may collect from you during your visit to our website is not personal information, because it does not reveal your identity. For example, we may record your server address, the date and time of your visit, the pages you viewed, any documents you downloaded and the type of browser and operating system you used.

If collected, this information will be used and disclosed by us in anonymous, aggregated form only, for purposes including statistical and web site development. However, we reserve our right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

#### 6. Quality and security of personal information

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. You can help us by letting us know about any changes to your personal information, such as your email address or phone number.

We store information in different ways, including in hardcopy and electronic form. We have implemented controls around technology and our organisational processes to assist us in protecting your personal information. This includes having in place confidentiality requirements for our employees, policies, systems and site access restrictions.

We require and expect all our employees and contractors to comply with the Act and our Privacy Policy, and will take appropriate action to address any breach by an employee or contractor of an obligation under the Act or the Policy. However we do not accept responsibility for the misuse of personal information by any third party.

While we will do our best to protect users' personal information, we cannot guarantee or warrant the security of any information transmitted online and users do so at their own risk. You can also contact us by telephone or post.

#### 7. Access and correction

Please contact us if you would like to access or correct the personal information that we hold about you. We will generally provide access or make corrections, subject to some exceptions permitted by law. We may charge a fee to cover our costs of providing access to you.

We may need to refuse to grant you access to your personal information under some circumstances prescribed by the Act (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals).

## 8. Overseas disclosure

We are unlikely to disclose personal information to overseas recipients. Overseas recipients of information may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, we will consider the extent to which the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme, unless the disclosure is consented to by the relevant individual or otherwise required or permitted by law.

## 9. How to make a complaint

If you believe that your privacy has been breached or you have a complaint about our handling of your personal or credit related information, please contact the Company Secretary on <a href="mailto:legal@senexenergy.com.au">legal@senexenergy.com.au</a>. We will investigate your complaint and provide you with a response.

We take complaints very seriously and will respond to you shortly after receiving written notice of your complaint.

#### 10. Authority

This policy was adopted on 12 March 2014 and ratified by a resolution of the Board of Directors on 11 June 2014, and last updated on 29 June 2020.

David Pegg

Secretary & Legal Counsel

**Senex Energy Limited** 

# **DOCUMENT HISTORY**

This policy is a Board approved document.

Revision date	Comments
12 Mar 2014	Adopted and approved board 11 June 2014
29 Jun 2020	General update (approved)



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