

JSW Australia (JSW) is committed to protecting personal privacy.

JSW will collect, manage, use and disclose personal information in accordance with all relevant legislation and standards. The National Privacy principles contained in the Privacy Act 1988 and National Privacy Principles, except when qualified by any relevant Codes of Practice, will dictate all matters relating to the use, collection and storage of personal information within JSW's operations.

This policy sets out:

- What is considered personal information;
- What personal information we collect and hold;
- How JSW collect, hold, use or disclose personal information;
- The purposes for which JSW collect personal information;
- What happens if JSW IS not able to collect personal information; and
- How to seek access to and correct your personal information;

JSW will periodically review and update this policy, including taking into account new or amended laws, new technology and/or changes to our operations. All personal information held by JSW will be governed by the most recently updated policy.

What is Personal Information

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses), previous work history, training and qualifications and possibly financial information, including your bank account, superannuation and taxation information. If the information JSW collect's personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

In regards to Personal Information JSW will:

- Only collect personal information for fair and lawful purposes;
- When reasonably possible, only collect information from the individual to whom it relates;
- Notify the individual concerned when it collects personal information either at the time of collection as soon as possible thereafter;
- Only collect such information as is reasonably necessary for the company to carry out its functions;
- State what the personal information will be used for and who will receive or have access to it;

- State if the collection is voluntary, and the consequences for individuals if it is not;
- Take reasonable steps to ensure that the personal information it holds is relevant, not excessive, up to date accurate, complete and that the collection does not unreasonably intrude on the personal affairs of individuals;
- Provide contact details regarding who to contact regarding access to and correction of personal information;
- Retain personal information for no longer than is reasonably necessary and ensure that its disposal is done in a secure and lawful manner;
- Protect personal information from loss, unauthorised access, use, modification or disclosure or other misuse; and
- Ensure that all reasonable steps are taken to ensure that personal information is not used or disclosed without authorisation by external service providers;

Personal Information that JSW Collects and Holds

JSW may collect the following types of personal information:

- Personal information including name, mailing or street address, email address, telephone number, age or birth date;
- profession, occupation or job title and previous work history including references;
- Medical information;
- Tax file number, Banking and Superannuation details;
- Emergency contact information;
- Training, qualifications, licences;
- Any additional information relating to you that you provide to us directly through our websites or indirectly through use of our website or online presence through our representatives or otherwise; and
- Information you provide to us through our websites, customer surveys or visits by our representatives from time to time.

How JSW Collect Personal Information

In nearly all instances JSW collect's your personal information directly from you unless it is unreasonable or impractical to do so.

JSW does this in ways including:

- Through your access and use of our website, email or sending SMS/MMS to us; and
- During conversations between you and our representatives; and

JSW may also collect personal information from third parties including:

- Recruitment agencies;
- Previous employers and clients; and
- Contractors and business partners.

Why Does JSW Collect, Hold, Use and Disclose Personal Information

The primary purpose for which JSW collects information about you is to enable JSW to perform its business activities and functions and to provide best possible quality of customer service. JSW will collect, hold, use and disclose your personal information for the following purposes:

- To provide information and services to you;
- To communicate with you including by email, mail or telephone;
- To verify your identity;
- To provide as part of business data to third parties if you have authorised us to do so;
- To conduct business processing functions for operation of our business;
- For our administrative, planning, quality control and operational purposes, or those of our contractors, clients or external service providers;
- To provide your updated personal information to us, our contractors, clients or external service providers;
- To investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- As required or permitted by any law (including the Privacy Act).

JSW will not disclose personal information outside the company except where;

- The subject of the information has consented to the disclosure in writing using the Information Release Form, or has been notified of the likelihood of disclosure; or
- JSW is required by Legislation or other legally enforceable instrument and the request is in the appropriate form; or

- Disclosure is reasonably believed to be necessary to prevent or lessen a serious and imminent threat to the life or health of any person; or
- The information is required by agencies such as TAC to meet compliance requirements of an enterprise RTO, or is required by law or standards to make employee information available to the National Centre for Vocational Education and Research.

In all other cases personal information will not be disclosed.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

What Happens If JSW Can't Collect Your Personal Information

If you do not provide JSW with the personal information described in this policy, some or all of the following may happen:

- We may not be able to provide you with the information or services you require in the course of your employment; and
- We may not be able to contact your next of kin in event of an emergency.

How Does JSW Disclose Your Personal Information

JSW may disclose your personal information to:

- Our employees, related bodies corporate, contractors or external service providers for the operation of our business, fulfilling requests by you, and otherwise provide products and services to you;
- Our existing or potential business partners, clients or joint venture entities or partners;
- Specific third parties authorised by you to receive information held by us;
- The police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary; and
- As required or permitted by any law (including the Privacy Act).

Accessing and Correcting Your Personal Information

You may request access to any personal information we hold about you at any time by contacting Head Office. Where JSW holds information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). If you make an access request, JSW will ask you to verify your identity. There may be instances where JSW cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it.

How You Can Complain About a Breach of Privacy

If you believe your privacy has been breached by JSW, have any questions or concerns about our Privacy Policy please, contact the Human Resources Department using the contact information below and provide details of the incident so that we can investigate it.

JSW has a formal procedure for investigating and dealing with complaints. Once the Human Resources Department receives a complaint, whether it is in writing or verbal means, the Human Resources Department will commence an investigation. The investigator will endeavour to determine the nature of the breach and how it occurred. JSW may contact you during the process to seek any further clarification if necessary. If a breach is found, the Human Resources Department will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. JSW will also contact you to inform you of the outcome of the investigation. JSW will endeavour to resolve all investigations within a reasonable time.

JSW will treat your requests or complaints confidentially.

Security

JSW will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access including by means of securing physical areas where information is stored, firewalls, password access and secure servers.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please contact the Human Resources Department immediately.

JSW may change this privacy policy from time to time. Any updated versions of this privacy policy will be communicated through normal means.

This privacy policy was last updated in September 2014.