



Privacy Manual

Vale Australia Pty Ltd and its related bodies corporate (**we, our, us**) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our “APP privacy policy” and it tells you how we collect and manage your personal information.

We respect your rights to privacy under the *Privacy Act 1988* (Cth) (**Act**) and we comply with all of the Act’s requirements in respect of the collection, management and disclosure of your personal information.

What is your personal information?

When used in this manual, 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 your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information do we collect and hold?

We may collect the following types of personal information:

- contact details, such as your residential or postal address, email address, telephone number or facsimile number;
- identification details, such as your name, age or birth date, photo, gender, signature, driver’s licence and evidence of your right to work in Australia;
- employment information, such as your resume, occupation or job title, profession, start date and length of time with us, industry experience or credit rating information;
- personal information contained in any emails entering and exiting our server,
- if you are an individual contractor – banking and financial details, such as your bank account details;
- if you are a contractor working on our premises – health information, such as medical assessments, drug screen results, medical declarations, WorkCover medical certificates, blood group details, allergies, permanent illnesses, medications, doctor’s details and training and qualification records; and
- if you are a contractor working with us – travel information, such as copy of passport, visa, next of kin contact details, blood group, allergies, permanent illnesses, medications), internet browsing history while using our network.



We may also collect any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise.

What personal information are we required to collect?

We are required to collect certain health and medical information under the *Queensland Coal Mining Safety and Health Regulation 2001*.

How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our website;
- during conversations between you and our representatives including where you or someone else sends us your resume;
- when you complete one of our forms or an application, tender, contract, purchase order or during your training with us;
- when you sign in at our offices or sites or undertake induction prior to entering our offices or sites;
- when you undergo a health assessment with our appointed doctor;
- directly from you or the company you work for; and
- through incident and internal investigations.

We may also collect personal information from third parties including from third party companies such as your employer, recruitment agencies, universities and other education institutions, credit reporting agencies, law enforcement agencies, your referees as listed in your resume and other government entities.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to comply with our legal obligations and properly manage our business risks which may mean that we are unable to support, assist or deal with you properly; and
- we may not be able to support your role as a contractor within our business.



For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of stakeholder engagement.

We collect, hold, use and disclose your personal information for the following purposes:

- to send communications requested by you;
- to answer enquiries and provide information or advice about our business;
- for access control, safety and training purposes;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for safety and identification reasons, including in the event of an emergency when a staff member is overseas;
- for the administrative, planning, and internal audit purposes of Vale Australia Pty Ltd, its related bodies corporate, contractors or service providers;
- to provide your updated personal information to our related bodies corporate, contractors or service providers;
- as a part of our overseas share incentive scheme;
- for general promotional purposes;
- to update our records and keep your contact details up to date; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

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

To whom may we disclose your information?

We may disclose your personal information to:

- our employees, related bodies corporate, contractors or service providers for the purposes of operation of our business (both within Australia and overseas), including, without limitation, web hosting providers, IT systems administrators, couriers, payment processors, data entry service providers, electronic network administrators, and professional advisors such as accountants, solicitors, business advisors and consultants; and



- any government authority which requires us to do so.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate (within Australia as well as overseas).

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold 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). We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we 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. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will let you know.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We will attempt to confirm as appropriate with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view. If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

With headquarters in Brazil and operations in more than 30 countries, Vale is a global company. Our offices, operations, exploration and joint ventures are spread over the five continents and a full list of the countries in which we operate can be found at <http://www.vale.com/EN/aboutvale/across->



world/Pages/default.aspx. We may disclose your personal information to entities located outside of Australia, including the following:

- our related bodies corporate, located globally, in particular, Brazil, Malaysia, Singapore and Canada and as set out at the following address <http://www.vale.com/EN/aboutvale/across-world/Pages/default.aspx>; and
- our data hosting and other IT service providers, located in Canada, Malaysia, China and India.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

As our Australian and global websites are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us or our related bodies corporate online is transmitted at your own risk.

Links

Our website may contain links to other websites operated by our global companies and third parties. We make no representations or warranties in relation to the privacy practices of any of those websites and we are not responsible for the privacy policies or the content of those websites. You can access a copy of the manual for Vale's www.vale.com and www.vale.br websites at <http://www.vale.com/en/pages/privacy-policy.aspx>. Third party websites are responsible for informing you about their own privacy practices.

Contacting us

If you have any questions about this manual, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer
Vale Australia Pty Ltd
Post: Level 11, 100 Creek Street, Brisbane Queensland 4000
Tel: 07 3136 0500
Email: privacy@valeaustralia.com.au



Changes to our manual

We may change this manual from time to time. Any updated versions of this manual will be posted on our website.

This manual was last updated on 13 March 2014.