

# PRIVACY POLICY

## 1. PURPOSE

We recognise that your privacy is very important to you. We are committed to protecting the privacy of your Personal Information in accordance with the *Privacy Act 1988* (Cth).

This Policy describes how the Company including its related companies which handle personal information collected in Australia, South Africa, the United States, Tanzania, Mozambique, Kenya, Ethiopia and Zambia, collects, holds, uses and discloses personal information consistent with the *Privacy Act 1988* (Cth).

The Policy is also notification to individuals of the matters required to be notified by the Australian Privacy Principles.

An individual who provides personal information to us is given access to this Policy.

By providing personal information to us, and by having access to this Policy, an individual consents to the Company collecting, holding, using and disclosing personal information in accordance with the Policy.

## 2. DEFINED TERMS

In this Privacy Policy:

- (a) *'Our', 'Us' and 'We' 'the Company'* refers to Windlab Limited, ACN 104 461 958 of Level 4, 60 Marcus Clarke Street, Canberra City, ACT 2601 Australia
- (b) *'Personal Information'* means any information or an opinion that can identify an individual. It is still personal information whether or not it is true.
- (c) *'Related Company'* has the same meaning as Section 50 of the Corporations Act 2001 (Cth).
- (d) *'You'* refers to anyone who provides us with personal information and includes our customers, suppliers, prospective employees, investors and prospective investors. It also generally refers to users of our websites.

## 3. COLLECTION OF PERSONAL INFORMATION

As outlined in this Policy, we collect personal information only if you are a customer, supplier, a project stakeholder, project participant, landowner, shareholder in any entity partially-owned or controlled by the Company, prospective employee, investor or prospective investor.

The types of Personal Information that we may collect from you and how we use it will depend on the products, services and facilities you use, how you use them and upon your status as a customer, supplier, prospective employee, investor and prospective investor.

## 4. WHAT PERSONAL INFORMATION IS COLLECTED?

Personal information collected by the Company may include your first, middle and last names; postal address; delivery address; email address; telephone number/s; property ownership, rights and mortgage details; tax file number; and selected bank account details.

If you do not provide this information we may not be able to engage with you in connection with our business.

## 5. HOW WE COLLECT AND HOLD PERSONAL INFORMATION

Wherever possible we collect personal information directly from you. We may collect your personal information via one of our websites, by telephone, facsimile, email, when you enter into an agreement with us, such as a lease or shareholders agreement, when you complete and submit applications or forms.

There may, however, be occasions where we collect your personal information from someone else. For example, where an application is made in joint names or where it is provided to us by a third party with your consent.

We are committed to keeping your personal information secure and will use all reasonable precautions to protect it from interference, loss, misuse or unauthorised modification, including:

- (a) securing external and internal premises;
- (b) restricting access to your personal information to employees or those who perform services on our behalf who are authorised to handle your personal information and on a 'need to know' basis;
- (c) entering into confidentiality agreements with relevant employees and third parties;
- (d) appropriate training of staff;
- (e) retaining your personal information for no longer than it is reasonably required to meet the purposes described in this Policy;
- (f) taking reasonable steps to destroy or de-identify personal information that is no longer required.

## 6. WHY WE COLLECT AND HOW WE USE PERSONAL INFORMATION

We generally collect personal information to provide the various products and services offered in connection with our business. More specifically, we collect and use personal information in order to process applications, calculate and process payments and confirm identification.

If we do not collect your personal information, or if you provide us with inaccurate or incomplete information, we may not be able to fulfil the purposes for which we collect personal information.

Your personal information may also be used by us for purposes including research and statistical analysis and marketing.

## 7. DISCLOSURE OF YOUR PERSONAL INFORMATION

WE NEVER SELL, RENT OR TRADE YOUR PERSONAL INFORMATION.

We may disclose your personal information to Related Companies and third party service providers.

For example, we disclose your personal information to third party service providers to perform activities in connection with the purposes described in this Policy. These disclosures include:

- (a) where a product or service you wish to acquire is provided or supplied by or through a third party;
- (b) where a third party, carries out activities on our behalf;
- (c) if disclosure is otherwise required in order to provide you with a particular service;
- (d) in order to ensure our ability to continue providing services;

- (e) if disclosure is required for the purposes of conducting business analysis in order to improve our services;
- (f) if disclosure is required by law;
- (g) where you have provided your consent which may be given expressly or may reasonably be implied by your conduct.

We require related and unrelated third parties to whom your personal information is disclosed to keep the information confidential and only use it for the same purposes we are permitted to use it.

We do not disclose any personal information collected in Australia, to any organisation outside Australia.

#### ACCESS TO YOUR PERSONAL INFORMATION

You may access the information we hold about you. This right is subject to the exceptions detailed in the Australian Privacy Principles.

In most cases, you may access your Personal Information at no cost by contacting our Privacy Officer on +61 2 6175 4600; or writing to us at Level 4, 60 Marcus Clarke Street, Canberra City, ACT 2601 Australia.

For complex or more detailed requests for access to your Personal Information, for example, access to information that is archived, we may require you to place your request in writing and charge you a fee for our reasonable costs of retrieving and supplying the information to you.

In all cases you will be asked to verify who you are before your Personal Information is provided.

All requests to access Personal Information will be handled in a reasonable time.

If we deny you access we will let you know why in writing.

### **8. CORRECTION OF YOUR PERSONAL INFORMATION**

During the course of your relationship with us we will ask you to inform us of any changes to your Personal Information.

You may update your Personal Information or advise us that the information we have is not accurate, complete or up to date by contacting our Privacy Officer on +61 2 6175 4600; or writing to us at Level 4, 60 Marcus Clarke Street, Canberra City, ACT 2601 Australia.

There are circumstances in which we can refuse to correct personal information. If we do so, we will provide a written notice providing reasons for the refusal which you will have an opportunity to make a formal complaint about if you feel is necessary.

All requests to correct Personal Information will be handled in a reasonable time.

### **9. COMPLAINTS**

You have a right to complain about how your personal information has been handled. If you are concerned about a breach of your privacy and wish to make a complaint, please provide a written complaint to us at:

Privacy Officer  
Windlab Limited  
Level 4, 60 Marcus Clarke Street  
Canberra City 2601  
ACT, Australia

We will respond in writing within 30 days of receipt of a complaint.

If the complaint remains unresolved, then you have the option of notifying the Office of the Australian Information Commissioner (OAIC). Contact details can be found at the OAIC's website: [www.oaic.gov.au](http://www.oaic.gov.au).

## **10. REVIEW AND CHANGES TO THIS PRIVACY POLICY**

This policy may change from time to time and all changes will be posted on this website.

Whenever you use our website you should read our Privacy Policy in conjunction with the terms of use of the relevant website.

**Adopted by the Board of Windlab Limited**  
22 June 2017