



Nyrstar Australia Region Policy: Privacy

Document No. (English)

Revision 4 (November 2020)

Review Date November 2021

Contents

1	CONTEXT	3
2	SCOPE	3
3	COLLECTION OF PERSONAL INFORMATION	4
4	ACCESSING PERSONAL INFORMATION	9
5	COMPLAINTS	9
6	OVERSEAS DISCLOSURE	9
7	RELEVANT CONTACTS	9

1 CONTEXT

This document is the privacy policy applying to Nyrstar (as defined in section 2 below) for the purposes of Australian Privacy Principle 1.3. It describes how Nyrstar manages personal information.

It is Nyrstar's intention to manage personal information in an open and transparent way.

2 SCOPE

This Policy applies to:

- Nyrstar Australia Pty Ltd (ACN 124 535 468);
- Nyrstar Hobart Pty Ltd (ACN 124 818 113); and
- Nyrstar Port Pirie Pty Ltd (ACN 008 046 428).

Each of these companies is an "APP entity" for the purposes of the Australian Privacy Principles.

Each of the these companies is referred to as "Nyrstar" in this document

3 COLLECTION OF PERSONAL INFORMATION

The following table sets out the personal information that Nyrstar may collect and hold, how that information may be collected and held, and the purposes for which it may be collected, held, used and disclosed.

Category of persons	Examples of information collected and held	Examples of how information is collected	Examples of how information is held	Examples of purposes for which information is collected, held, used and disclosed
Customers (for example, individuals who purchase zinc and lead products)	<ul style="list-style-type: none"> • Name, address and other contact information (for example, e-mail addresses and telephone numbers) • Purchasing habits • Credit information (for example, through the receipt of a credit report prepared by a third party) 	<ul style="list-style-type: none"> • Customer completing or confirming personal information in a purchase contract with Nyrstar • Customer volunteering information to Nyrstar to enable background and credit checks • Credit agencies providing results of background or credit checks • Internal Nyrstar analysis and review of customer purchasing habits 	<ul style="list-style-type: none"> • If information is received in electronic form (for example, by e-mail) it will generally be stored on Nyrstar's computer systems or in third party software installed on those systems. Nyrstar takes reasonable steps to protect the confidentiality of its computer systems. • If information is received in hard copy format it will be filed at Nyrstar's sites or offices, or destroyed securely. Nyrstar has a document retention policy which identifies for how long Nyrstar will file and hold particular information. 	<ul style="list-style-type: none"> • To enable Nyrstar to contact and liaise with customers from time to time • To enable Nyrstar to determine whether an individual is an appropriate person to whom to sell products • To enable Nyrstar to market product to the most appropriate or likely purchasers
Suppliers and consultants (for example, individuals who provide goods and services)	<ul style="list-style-type: none"> • Name, address and other contact information (for example, e-mail addresses and telephone numbers) • Photograph (generally a headshot) 	<ul style="list-style-type: none"> • Supplier or consultant completing or confirming personal information in a supply or consultancy contract with Nyrstar • Supplier or consultant undergoing blood testing as 	<ul style="list-style-type: none"> • If information is received in electronic form (for example, by e-mail) it will generally be stored on Nyrstar's computer systems or in third party software installed on those systems. 	<ul style="list-style-type: none"> • To enable Nyrstar to contact and liaise with customers from time to time • In relation to photographs, to include on access cards and to enable identification

Category of persons	Examples of information collected and held	Examples of how information is collected	Examples of how information is held	Examples of purposes for which information is collected, held, used and disclosed
	<ul style="list-style-type: none"> Health information (for example, results of blood testing) Movement on and around operating sites and offices (through closed circuit video cameras and access cards) 	<ul style="list-style-type: none"> part of Nyrstar site induction or periodic review Nyrstar using closed circuit video cameras and access cards on its sites and offices and electronically recording movement 	<ul style="list-style-type: none"> Nyrstar takes reasonable steps to protect the confidentiality of its computer systems. If information is received in hard copy format it will be filed at Nyrstar's sites or offices, or destroyed securely. Nyrstar has a document retention policy which identifies for how long Nyrstar will file and hold particular information. 	<ul style="list-style-type: none"> at security points To ensure suppliers and consultants who are working on site are not physically or medically affected by exposure to elements, compounds and other materials which are present on site To ensure that safety and security of Nyrstar and third party personnel and property
Employees	<ul style="list-style-type: none"> Name, address and other contact information (for example, e-mail addresses and telephone numbers) Date of birth Photograph (generally a headshot) Health information (for example, results of blood testing) Terms of employment, including personal and emergency contact details, hours of employment, remuneration, leave records, taxation, banking and superannuation information and 	<ul style="list-style-type: none"> Employee completing or confirming personal information in an employment contract with Nyrstar, and otherwise providing personal information (e.g. banking and superannuation details) during induction or from time to time Employee undergoing blood testing as part of Nyrstar site induction or periodic review Nyrstar using closed circuit video cameras and access cards on its sites and offices and electronically recording 	<ul style="list-style-type: none"> If information is received in electronic form (for example, by e-mail) it will generally be stored on Nyrstar's computer systems or in third party software installed on those systems. Nyrstar takes reasonable steps to protect the confidentiality of its computer systems. If information is received in hard copy format it will be filed at Nyrstar's sites or offices, or destroyed securely. Nyrstar has a document retention policy which identifies for how long Nyrstar will file and hold 	<ul style="list-style-type: none"> To enable Nyrstar to contact next of kin in an emergency To enable Nyrstar to contact the employee whilst not at site or in an office In relation to photographs, to include on access cards, to enable identification at security points and to display in internal e-mails To enable Nyrstar with laws and regulations which require Nyrstar to have relevant personal information (e.g. to comply with withholding tax requirements) To enable Nyrstar to pay

Category of persons	Examples of information collected and held	Examples of how information is collected	Examples of how information is held	Examples of purposes for which information is collected, held, used and disclosed
	<p>performance and conduct information</p> <ul style="list-style-type: none"> • Background and police checks • Internet and e-mail usage and documents and other files created or stored on local computers (as a consequence of using Nyrstar's computer systems) • Mobile telephone usage (if using a Nyrstar supplied mobile telephone plan) • Movement on and around operating sites and offices (through closed circuit video cameras and access cards) 	<p>movement</p> <ul style="list-style-type: none"> • Ownership and operation of Nyrstar computer servers and electronic storage devices which record e-mail and internet usage • Receipt of mobile telephone invoices for employees from time to time (for Nyrstar supplied plans) 	<p>particular information.</p>	<p>remuneration to or on behalf of employees</p> <ul style="list-style-type: none"> • To ensure employees understand their employment duties to Nyrstar, and are complying with those duties • To ensure no inappropriate or illegal conduct occurs through the use of Nyrstar's computer systems • To ensure Nyrstar complies with its duties to other personnel (e.g. to avoid harassment of other employees) • To ensure Nyrstar property is being used appropriately and primarily for work-related purposes • To ensure employees who are working on site are not physically or medically affected by exposure to elements, compounds and other materials which are present on site • To ensure that safety and security of Nyrstar and third party personnel and property

Category of persons	Examples of information collected and held	Examples of how information is collected	Examples of how information is held	Examples of purposes for which information is collected, held, used and disclosed
Prospective employees	<ul style="list-style-type: none"> Job application including cover letter and resume (which themselves may include name, address and other contact information, date of birth, education, experience, skills and hobbies) 	<ul style="list-style-type: none"> Individuals sending job applications directly to Nyrstar Nyrstar soliciting job applications through advertising, or through recruitment agencies engaged by Nyrstar 	<ul style="list-style-type: none"> If information is received in electronic form (for example, by e-mail) it will generally be stored on Nyrstar's computer systems or in third party software installed on those systems. Nyrstar takes reasonable steps to protect the confidentiality of its computer systems. If information is received in hard copy format it will be filed at Nyrstar's sites or offices, or destroyed securely. Nyrstar has a document retention policy which identifies for how long Nyrstar will file and hold particular information 	<ul style="list-style-type: none"> To enable Nyrstar to assess suitability for current or future roles with Nyrstar
Individuals who access and use Nyrstar's website and its intranet website	<ul style="list-style-type: none"> Date and time of access ("timestamp") The "web browser" used The IP address of the individual Any data accessed or downloaded or inputted into the website 	<ul style="list-style-type: none"> The information is generally collected through the use of "cookies". A cookie is a small text file generated by a software application on a website and stored on the hard disk of the user's computer. Cookies may contain specific information. 	<ul style="list-style-type: none"> Information is collected in electronic form and will generally be stored on Nyrstar's computer systems or in third party software installed on those systems. Nyrstar takes reasonable steps to protect the confidentiality of its computer systems. 	<ul style="list-style-type: none"> To enable Nyrstar to improve the information available on its websites (by identifying information preferences) To enable Nyrstar to collect statistical data about the sorts of persons who use its websites To enable Nyrstar to undertake direct marketing

Category of persons	Examples of information collected and held	Examples of how information is collected	Examples of how information is held	Examples of purposes for which information is collected, held, used and disclosed
<p>Individuals who access and use websites with which Nyrstar has an affiliation, including: www.comeseexchange.com www.tlap.com.au www.portpiriesmeltherhistory.org</p>	<ul style="list-style-type: none"> • Date and time of access (“timestamp”) • The “web browser” used • The IP address of the individual • Any data accessed or downloaded or inputted into the website, including through online “forms” on the websites 	<ul style="list-style-type: none"> • The information is generally collected through the use of “cookies”. A cookie is a small text file generated by a software application on a website and stored on the hard disk of the user’s computer. Cookies may contain specific information. • Information may also be collected via an online form. 	<ul style="list-style-type: none"> • Information is collected in electronic form and will generally be stored on Nyrstar’s computer systems or in third party software installed on those systems. Nyrstar takes reasonable steps to protect the confidentiality of its computer systems. • Information may also be stored in third party external online software such as Mailchimp, In these cases Nyrstar takes reasonable steps to protect the confidentiality of the log-in, password details of the Mailchimp account. 	<ul style="list-style-type: none"> • To enable Nyrstar to improve the information available on its websites (by identifying information preferences) • To enable Nyrstar to collect statistical data about the sorts of persons who use its websites • To enable Nyrstar to undertake direct marketing • To enable Nyrstar to assess and assign use of assets such as logos and photos to third party individuals who request it. • To enable Nyrstar to collect information and respond to those who make enquiries or otherwise provide information via the website forms.

4 ACCESSING PERSONAL INFORMATION

An individual may access personal information about themselves, and if appropriate seek correction of that information, by writing to:

By e-mail:
Australia.PrivacyOfficer@nyrstar.com

or

By post:
Australia Privacy Officer, Nyrstar
c/- Company Secretary, Nyrstar Australia Pty Ltd
PO Box 377
Hobart Tasmania 7001

5 COMPLAINTS

If an individual has a complaint about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds Nyrstar, they should provide details of the complaint and contact details in writing to:

By e-mail:
Australia.PrivacyOfficer@nyrstar.com

or

By post:
Australia Privacy Officer, Nyrstar
c/- Company Secretary, Nyrstar Australia Pty Ltd
PO Box 377
Hobart Tasmania 7001

Nyrstar will assess each complaint, consider what action or remedies may be appropriate, and provide a written response to the complainant. Nyrstar will respond to each complaint as promptly as possible in the circumstances. Nyrstar will treat each complaint confidentially to the extent possible.

6 OVERSEAS DISCLOSURE

Nyrstar is part of a global mining, metals processing and marketing business.

It is likely that Nyrstar will disclose certain personal information to “overseas recipients”, being its non-Australian related bodies corporate. This disclosure will tend to form part of Nyrstar’s administrative processes (for example, by sharing employee information with other group companies or holding such information in computer servers located at global headquarters).

The overseas recipients are likely to be located in:

- Belgium
- The Netherlands
- Canada
- USA
- Norway
- France

In accordance with Australian Privacy Principle 8.1, Nyrstar will take reasonable steps to ensure that overseas recipients do not breach the Australian Privacy Principles in relation to any personal information that is disclosed to them.

7 RELEVANT CONTACTS

Any question regarding this Policy can be sent to:

By e-mail:
Australia.PrivacyOfficer@nyrstar.com

or

By post:
Australia Privacy Officer, Nyrstar
c/- Company Secretary, Nyrstar Australia Pty Ltd
PO Box 377
Hobart Tasmania 7001