



PRIVACY POLICY



INNOGY LIMITED ACN 655 292 283



Privacy Policy

Commitment

Innogy Limited (**Innogy** or the **Company**) is committed to protecting Personal Information provided by its suppliers, contractors, employees and other individuals. The Company manages the collection, use and disclosure of Personal Information in accordance with the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (**Privacy Act**), the General Data Protection Regulation (**EU GDPR**) and the *Data Protection Act 2018* (**UK DPA**). In Australia, the Privacy Act will be the applicable legislation, in the European Union (**EU**), the EU GDPR will be the applicable legislation and in the United Kingdom (**UK**), the UK DPA will be the applicable legislation.

The purpose of this policy (**Policy**) is to outline the practices that the Company, and all the members of the Innogy group of companies, follow in protecting and managing Personal Information, however other policies may apply instead of or in addition to this Policy in certain circumstances.

By using our website at www.innogylimited.com.au (**Website**) and/or providing your Personal Information to us you consent to us handling your Personal Information in accordance with this Policy.

Definitions

In this Policy:

Personal Information means information about an identifiable individual and, where applicable, includes employee personal information, as defined in the applicable privacy legislation, but does not include business contact information such as an individual's name, title, business address, business telephone number or business e-mail address used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession.

Privacy Commissioner shall mean the Office of the Australian Information Commissioner, the EU Information Commissioner's Office or the UK Information Commissioner's Office, as applicable.

Collection of Personal Information

The Company only collects Personal Information that is necessary for operating its business or for other related purposes that you would reasonably expect (or as otherwise authorised or required by law in the applicable jurisdiction), including Personal Information needed to:

- establish and maintain commercial relationships;
- communicate and make payments to suppliers, contractors and other individuals, including security holders;
- manage and develop its business and operations; and
- meet legal and regulatory requirements.



In general, the Company only collects information directly from the individuals to which it pertains. However, the Company may collect information from other sources, including publicly available sources, our agents, clients, contractors and others. Such information is collected only with the consent of the individuals to whom the information pertains, or as authorised, permitted or required by law.

The type of information we collect will depend on your dealings with us. Generally, we will collect your name, contact details (including address, telephone number, fax number and email address), business details business name and your position within the company – if applicable), information about your communications with us, and about services or goods ordered, acquired or supplied as well as Personal Information required, in order to manage any holding of shares or other securities in the Company, service your needs as an investor and otherwise administer any holding of shares or other securities you have with us.

We may also collect other personal and sensitive information from you (for example, if you are applying for a position with the Company then the Personal Information we collect may include your resume, qualifications, skills, education provider and history, work history and residency status).

Personal Employee Information

To the extent permitted by applicable privacy legislation, the Company may collect, use or disclose Personal Information of any potential, current or former employee without the consent of the employee for the purposes of establishing, managing or terminating the employment relationship, or managing the post-employment relationship. The Company will provide the individual with notice that their Personal Information will be collected, used or disclosed, including the purposes for which the information will be collected, used or disclosed.

Personal Information regarding employees may be collected used and disclosed for purposes including, but not limited to:

- in the case of an emergency involving the individual's safety;
- hiring, promotion and compensation;
- compliance with legal requirements and obligations;
- compliance with requirements of applicable professional governing bodies;
- provision and administration of health and welfare benefits and programs;
- human resources and payroll administration;
- professional development and performance management; and
- enforcement of the Company's policies and procedures.

In Australia, the Privacy Act may not apply to certain Personal Information in respect of employees. Except as otherwise permitted by applicable privacy legislation (such as by the Privacy Act in Australia), all Personal Information in respect of employees shall be treated in the same manner as other Personal Information, in accordance with the terms of this Policy. This means that, unless otherwise indicated (such as in Australia), the provisions of this Policy shall apply to all Personal Information relating to employees.



Consent

The Company will ask for consent to collect, use or disclose Personal Information, except in circumstances where collection, use or disclosure of Personal Information without consent is authorised or required by law. The Company may imply consent in cases where an individual volunteers information for an obvious purpose.

Individuals may withdraw their consent to the use and disclosure of Personal Information at any time unless the Personal Information is necessary to fulfill the Company's legal obligations. The withdrawal of an individual's consent to the use and disclosure of Personal Information may mean that the Company will not be able to continue a commercial relationship or provide certain products and services if it does not have the necessary Personal Information.

Use and Disclosure of Personal Information

The Company will use and disclose Personal Information only for the purposes for which the information was collected, for other related purposes that you would reasonably expect and as otherwise authorised or required by law. If the Company wishes to use or disclose Personal Information for a new purpose, the Company will ask for consent unless consent is not required by law.

The Company may, from time to time, transfer Personal Information to its affiliates located overseas. Such affiliates may be located in Australia, the UK, the EU and Tanzania. Such affiliates may receive, process and handle Personal Information for the purposes described in this Policy and will provide a level of protection for Personal Information that is comparable to that provided by the Company. However, while the Company will take all appropriate measures to prevent the use or disclosure of Personal Information, other than as required for the purposes set out in this Policy, Personal Information processed and stored outside of Australia, the EU, the UK and Tanzania may be accessible to foreign government agencies, including law enforcement and national security authorities.

Additionally, the Company may disclose Personal Information to other third-party service providers for the purposes of providing services or functions on behalf of the Company. Personal Information will not be disclosed to such third-party service providers except as described in this Policy, with consent of the individual or as required or permitted by law. The Company will endeavour to ensure that its contracts with third party service providers limit the retention, use and disclosure of Personal Information by the third-party service provider solely for the purpose of carrying out the contracted services and provide a level of protection for Personal Information that is comparable to that provided by the Company.

Protecting Personal Information

The Company protects Personal Information in a manner appropriate to the sensitivity of the information. The Company will make every reasonable effort to prevent loss, misuse, disclosure, copying, modification, disposal or destruction of Personal Information or any unauthorised access to Personal Information. Employee access to Personal Information is limited to those employees who require such Personal Information to carry out their responsibilities. The Company will retain Personal Information only for as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes and will employ appropriate measures to render Personal Information non-identifying or destroy Personal Information, including shredding paper records and permanently deleting electronic records, once the information is no longer necessary.



Access to Records

Individuals may access their own Personal Information in the Company's custody or control, subject to certain exceptions. For example, under the applicable privacy legislation access may not be given where the information contains Personal Information about another individual or confidential business information. Access may also be refused if the information is subject to solicitor-client privilege. If refusing a request in whole or in part, the Company will provide the reasons for the refusal. In some cases where exceptions to access apply, the Company may withhold that information and provide the remainder of the information. No fee will be incurred for requesting access to your own Personal Information, but if your request for access is accepted, we will inform you of the fee (if any) that will be payable for providing access if you proceed with your request.

Individuals may make a request for access to their Personal Information by writing to the Chief Executive Officer or Company Secretary via the contact details below. Sufficient information must be provided in the access request to allow the Company to identify the information the individual is seeking. Depending on the relevant privacy legislation, in some circumstances individuals may also request information about the Company's use of their Personal Information and any disclosure of that information to persons outside the organisation.

Additionally, individuals may request a correction if there is an error or omission in their Personal Information.

The Company will respond to an individual's request within the time limits specified by the applicable privacy legislation and will indicate whether the individual is entitled to access the information. If access is refused, the Company will provide reasons for the refusal, the name of the person who can answer questions about the request and advise of the right to have the decision reviewed by the relevant Privacy Commissioner.

Changes to this Policy

We may amend, modify or replace this Policy at any time. You should review our Policy each time you visit our Website or provide us with Personal Information.

Compliance Inquiries

Any inquiry, correction or complaint about this Policy or the collection, use and disclosure of Personal Information by the Company should be directed in writing to:

Innogy Limited

18 Richardson Street
West Perth, Western Australia 6005
Australia

Telephone: +61 8 6424 9000
Email: info@innogylimited.com.au

Attention: Chief Executive Officer or Company Secretary

We will confirm receipt of your inquiry, correction or complaint and in relation to a complaint, set out the time frame we require to investigate your complaint and provide you with a response, which generally, will be within 14 days of receiving your complaint.

If an individual is not satisfied with a response or has a complaint following contacting us, the individual may contact the relevant Privacy Commissioner.