



VINTAGE ENERGY

Privacy policy

Vintage Energy Ltd ACN 609 200 580
(Company)

Privacy policy

1. About this policy

Vintage Energy Limited (ACN 609 200 580) and its related entities (as defined in the Corporations Act 2001 (Cth)) (**Vintage**) are committed to protecting the privacy of individuals' Personal Information. Vintage is bound by the Privacy Act 1988 (Cth) and the Privacy Principles set out in it.

This privacy policy outlines how Vintage manages Personal Information, including the type of information, how it is collected and held, the purposes for which it is collected, held, used and disclosed, as well as how individuals can access their information and make enquiries or complaints about breaches of the legislation or Privacy Principles. Vintage deals with Personal Information in accordance with the legislation and this policy. The legislation and policy do not generally apply to employee records.

2. Types of Personal Information

Vintage collects Personal Information about individuals, e.g. clients and prospective clients, consultants, subcontractors, suppliers, industry participants, competition participants, shareholders, candidates for employment, and employees.

This can include things such as name, address, telephone number, email address; date of birth, age, gender, marital status; banking and superannuation details, credit card details; driver's licence and other occupational licence details, passport number, tax file number, photographs; medical history, records and reports; information about financial status, credit history and insurances; proof of the right to work in Australia, or with children; resumes; qualifications, next of kin, employment history; criminal history; references; and use of Vintage's services.

We aim to collect this information only as reasonably necessary to provide proposals, products and services to our clients, candidates and competition participants; to assist candidates to find employment; to understand and forecast our business; and to respond to requests for information. Individuals are not required to provide us Personal Information, however withholding it might mean we are not able to satisfactorily fulfil those purposes.

We may also collect information about you from your access to our websites (for statistical purposes). This information is usually anonymous, and we do not use it to identify you. However, due to the nature of internet protocols, such information might contain details that identify you, such as your IP address, internet service provider, the web page directing you and your activity on our website.

If you are a shareholder, we or our third-party share registry provider may ask you for your address, bank account details and tax file number and any other information that we may require to help us administer your shareholding.

3. How we collect and hold Personal Information

Vintage may collect Personal Information through our marketing, business development, operational, human resources, finance, risk, research or other activities.

We will generally collect Personal Information directly from you, unless it is unreasonable or impracticable to do so. We will generally only collect Sensitive Information about you with your consent or if authorised by law. By providing us with Personal and Sensitive Information, you consent to our collection and use of it for the purposes set out in this policy.

We may collect information from other sources such as: your employer when your employer is seeking our services; referees proposed by you; previous employers; police or (with your consent); agreements we enter; order forms, credit applications, surveys or other forms submitted to us; telephone or in-person discussions about our services and business; correspondence, emails or other electronic means (e.g. accessing our website and using the 'contact us' form or using social media sites); third parties (such as our agents and advisors, network contacts, credit providers, credit reporting bodies, regulatory bodies, government offices or your agents); and

publicly available sources of information.

We collect data from our website using various technologies, including 'cookies'. A 'cookie' is a text file that our website sends to your browser which is stored on your computer as an anonymous tag identifying your computer (but not you) to us. You can set your browser to disable cookies. However, some parts of our website may not function properly (or at all) if cookies are disabled.

Vintage takes reasonable steps to hold Personal Information using appropriate physical and/or electronic security technology, settings and applications (e.g. passwords and firewalls), and by training staff who deal with Personal Information on our policies and procedures. These measures are designed to protect Personal Information from unauthorised access, modification or disclosure; and from misuse, interference and loss. Notwithstanding this, you should be mindful that the internet is generally not a secure environment.

4. Purposes for which Personal Information is collected, held, used and disclosed

Vintage will only use Personal Information for the primary purpose for which we collect it, or a secondary purpose related to the primary purpose for which you would reasonably expect us to use the collected information.

We generally collect, hold and use Personal Information for the primary purpose of providing our services to our clients and prospective clients. We may also do so for a secondary related purpose, such as recording bank details to process payments.

We will not use your information for an unrelated secondary purpose unless we obtain your written consent, or an exception applies (e.g. it is authorised by law; or it is impracticable to obtain your consent and we believe it is necessary to lessen a serious threat to the life, health or safety of any individual).

Some examples of the purposes for which we collect, hold and use Personal Information are to: conduct business with or provide services to clients (including providing your details to clients and to prospective employers if you are an applicant for employment or job placement) and otherwise administer client's accounts; market or otherwise promote our services; seek participation in promotions etc.; disclose health information to health professionals in a medical emergency; record details of incidents for insurance purposes; contact family if requested or needed; improve our services through audits, surveys etc.; obtain professional advice; comply with our obligations under applicable law.

We may disclose Personal Information to third parties, such as credit reporting agencies, banks, professional advisers, courts, tribunals, regulatory authorities, other companies and individuals for the purposes such as: complying with our obligations under contract or as required by law; having services performed such as delivering packages, addressing warranty claims, sending correspondence, obtaining ASIC and/or other searches and processing payments; and recovering unpaid debts. We may also disclose your information to our business associates, such as Joint Venture or Alliance partners, auditors, and financial services, IT or insurance providers, for them to provide or offer services to you. We will not authorise third parties to use your information for any other purpose.

We may provide statistics about our staff, prospective employees, customers, readers, sales, traffic patterns and related site functions to reputable third parties primarily to assist us to improve our services.

Vintage may use Personal Information we collect for direct marketing if you would reasonably expect it to be used for that purpose, or you consent, or another exception applies. We provide an easy opt-out procedure for you to request your information not be used for direct marketing.

5. Disclosure to overseas recipients

Vintage has operations and entities based in Australia, the countries in which we operate may change from time to time. We may disclose personal information to third parties who are not located in Australia for purposes set out in our Privacy Guideline.

6. Access to and correction of Personal Information

You are entitled at any time, upon request, to access your Personal Information held by us. We will respond within a reasonable time after the request is made and give access to the information in the manner requested by you, unless it is impracticable to do so. We will not disclose commercially sensitive information to you. Employment records fall outside the disclosure requirements of the Privacy Act. If you are or were an employee, we will generally provide you with access to information that you have provided to us unless it is impracticable to do so. Information obtained from third parties or produced by us would be excluded from disclosure. We are entitled to charge you a reasonable administrative fee for giving you access to the information requested. If we refuse access to your information, we will explain the reasons for refusal and advise of the mechanisms to complain.

If we are satisfied that any of the information we have about you is inaccurate, out-of-date, irrelevant, incomplete or misleading, or you request we correct any information, we will take reasonable steps to ensure the information held by us is accurate, up-to-date, complete, relevant and not misleading. If you request, we will notify the correction to recipients to whom we have disclosed the information, unless it is impractical or unlawful. If we refuse your request, we will explain the reasons for refusal and advise on the mechanisms to complain.

7. Complaints

If you wish to complain about our response to a request, or a potential breach of this policy or the Privacy Principles, please contact Vintage's Privacy Officer:

Privacy Officer
Vintage Energy Ltd
58 King William Road
Goodwood SA 5034

or

administration@vintageenergy.com.au

If you are not satisfied with our response, you may contact the Office of the Australian Privacy Commissioner www.oaic.gov.au

Vintage reserves its right to amend this policy from time to time and re-publish it on our website.