



## Australia Business Unit East & Australia Business Unit West

# Privacy Policy

ConocoPhillips Australia adopts the Australian Privacy Principles in accordance with the [Privacy Act \(1988\)](#) in relation to its collection, use, storage and disclosure of personal information.

The Privacy Act applies to personal information collected from any individual. This Privacy Policy addresses specifically the categories of persons ConocoPhillips Australia predominately collects personal information from, including employees and contractors (including individuals who apply for a position as such), and individuals with whom ConocoPhillips Australia engage through community involvement.

### Copyright

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Infringement of copyright or other intellectual property rights can result in liability to pay monetary damages. It may also be a criminal offence to copy or to deal commercially with infringing copies of this document.

**Note:** ConocoPhillips reserves the right to administer, interpret, revise or terminate any or all of the provisions of this Policy. Nothing contained in this Policy shall constitute a part of any employment contract or create a required procedure, practice or policy that must or should be followed in the investigation, evaluation or disposition of any personnel matter. This Policy is subject to revision or revocation by ConocoPhillips at any time without further notice at the sole discretion of ConocoPhillips.

## 1.0 POLICY

ConocoPhillips Australia (including all of its Australian group companies) (**we, our or us** in this Privacy Policy) respect the privacy of personal information you may provide to us. The way we manage your personal information is governed by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) established under the Privacy Act. The APPs regulate the collection, use, storage and disclosure of personal information.

When used in this Privacy Policy, the term “personal information” has the meaning given to it in the Privacy Act. In general terms, personal information is any information that can be used to identify you; for example, your name, address, telephone number and email address. If the information that we collect identifies you, or your identity can be reasonably ascertained from it, then that information will be personal information.

This Privacy Policy explains how we manage the personal information we hold about you. Please note that this Privacy Policy is to be read subject to any overriding provisions of law or contract.

## 2.0 APPLICATION

The Privacy Act applies to personal information collected from any individual, however, this Privacy Policy addresses specifically the categories of persons we predominately collect personal information from, including our employees and contractors (including individuals who apply for a position as such), and individuals with whom we engage through community involvement.

When you interact or correspond with us, you will ordinarily have to identify yourself, which will involve providing your personal information to us.

This is because it is impractical in most circumstances for you to remain anonymous and we may not be able to do business with you or answer your enquiry if we are not able to identify you or collect your personal information.

If it is practical and appropriate in the circumstances, you may not have to identify yourself when you interact with us or you may use a pseudonym.

We may also collect your personal information from third parties you refer to us (for example, your advisers or representatives). If we do so, we will assume and you will ensure that you have made the third party aware of your referral and the purposes involved in the collection, use and disclosure of your personal information.

### ***Electronic Communications Monitoring***

We may from time to time monitor, access and disclose any information sent through or stored on our computer systems, which may include (but is not limited to) incoming and out-going emails, access and use of the Internet and information stored on our individual computer systems or network attached storage. By accessing our computer systems, you acknowledge our right to monitor your use of our computer systems and that you have no expectation of privacy in the communications or information sent, received or stored on our computer systems.

## 3.0 PERSONAL INFORMATION

### 3.1 Employees and Contractors

#### *Applicants*

If you are applying for a position with us (either as an employee or a contractor), we will ask you to provide specific personal information, such as your name, email address, telephone number, proof of right to work documents, qualifications and career history.

We may also ask you provide other personal information in relation to your application, such as your interests and the position(s) you are interested in.

Any personal information that you provide to us in connection with your application may be used to consider you for current and future employment or engagement as an employee or a contractor. We may disclose any personal information that you provide to our external advisors to assist us in the selection and recruitment process.

If your application is unsuccessful, the Privacy Act will apply to any personal information that we collect, use, hold and disclose about you. We may retain this information for a reasonable period, for example to enable us to contact you in relation to other employment or contracting opportunities that you may be interested in.

#### *Employees*

If you are or become one of our employees, we will collect employee records and personal details, referee reports and other information about you. The handling of your personal information as an employee is exempt from the Privacy Act if it is directly related to your current or former employment relationship with us. However, we will not disclose your personal information for any other purpose, other than as required or authorised by law or to manage your employment relationship with us.

#### *Contractors*

If you are engaged by us as a contractor, the Privacy Act will apply to any personal information that we collect, use, hold and disclose about you. The types of personal information we may collect include:

- your contact and identification details such as your name, address, date of birth, telephone number and email address;
- your banking details and tax details (including your ABN if applicable);
- contact and identification details of any third party that you have authorised to negotiate on your behalf;
- any correspondence between you and us; and
- any other personal information you provide when you make an enquiry, request information, correspond with us or make a complaint.

We may use your personal information:

- in order to manage and administer our engagement of you as a contractor;
- to communicate with you about your business or other relationship with us;
- to update our records and keep your contact details up to date;
- to do anything which you authorise or consent to us doing; or
- take any action we are required or authorised by law to take.

## 3.2 Community Engagement and Enquiries

### ***What personal information do we collect from members of the community?***

We collect personal information from members of the community who contact us.

Where we interact with community organisations and similar stakeholders, we may also collect personal information about identified individuals or the representatives of these organisations as part of this engagement.

The types of personal information we may collect include:

- your contact and identification details such as your name, address, date of birth, telephone number and email address;
- any correspondence between you and us; and
- any other personal information you provide when you make an inquiry, request information, correspond with us or make a complaint, including information necessary to respond or address any community or other concerns that have been raised with us. If it is relevant to the enquiry or concern, this may include collecting sensitive information.

### ***How do we collect personal information?***

We will collect your personal information directly from you unless it is unreasonable or impracticable to do so. We may collect personal information directly from you in a number of ways, including through our website, by telephone, through any documents (such as contracts or public records) you provide to us, written correspondence (such as letters and emails) and in person.

We may also collect personal information about you from third parties we deal with, including:

- our related bodies corporate;
- the companies which are from time to time shareholders in Darwin LNG Pty Ltd (in our capacity as operator of the Darwin LNG plant);
- our joint venture partners;
- government and law enforcement agencies;
- our professional advisers (for example, our consultants);
- our contracted service providers; and
- any other organisation conducting activities on our behalf.

### ***Why do we collect, use and disclose your personal information?***

We collect, use and disclose your personal information to enable us to provide you with the services, products and information you request. In particular, we may use your personal information:

- to respond to your enquiry or concern;
- to communicate with you about your business or other relationship with us;
- if you lodge a complaint with us, to process and respond to your complaint;
- to update our records and keep your contact details up to date;
- to do anything which you authorise or consent to us doing; or
- take any action we are required or authorised by law to take.

## 4.0 ACCESS & CORRECTION

To effectively conduct our business with you, it is important that the personal information we hold about you is complete, accurate and current. At any time while we hold your personal information, we may ask you to tell us of any changes to your personal information.

Alternatively, if you believe that any personal information that we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading and needs to be corrected or updated, please contact us using our details listed in Section 8 below.

If we correct any personal information that we hold about you, you may request that we notify a third party that we have corrected any personal information that we hold about you. We will take reasonable steps to comply with such a notification request if made by you.

You can also ask to obtain access to your personal information that we hold by contacting us at the contact details in Section 8 below. We will always try to provide you with suitable means of accessing your personal information (such as by mailing or emailing it to you). We will also try to provide access to you within a reasonable time, where possible.

We will not charge you for making a request for access or for making any corrections to your personal information. However, we may in some circumstances charge a reasonable fee to cover our costs of providing you with access to your personal information, for example, if you make multiple requests for information, the information requested is voluminous or we incur third party costs in providing you with access to your personal information.

We may not be required to provide you with access or correct your personal information under some circumstances in the Privacy Act (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals). Also, we may not be able to require other entities to provide access to personal information about you. If we decide not to provide you with access to or correct your personal information, we will give you reasons for our decision. Where we do not agree that there are grounds for amendment of your personal information then we will (if you request) add a note to the personal information stating that you disagree with it.

## 5.0 DISCLOSURE

### 5.1 General

We may disclose your personal information to other entities in connection with the purpose for which such information was collected.

Some of these entities act or perform functions on our behalf, and if this is the case we will (wherever possible) require that entities manage your personal information in accordance with the Privacy Act.

These entities may include:

- our related bodies corporate;
- the companies which are from time to time shareholders in Darwin LNG Pty Ltd (in our capacity as operator of the Darwin LNG plant);
- our joint venture partners;
- any entity to which we are authorised or required by law to disclose your personal information (such as law enforcement agencies and government and regulatory authorities);
- where information was provided by you in relation to a contractor position, our employees and other contractors so that these people may contact you in

relation to your engagement as a contractor, including to provide instructions or to review and pay invoices related to your engagement;

- our contracted service providers (such as information technology suppliers and mailing and logistics providers);
- our professional advisors (such as accountants, auditors and lawyers); and
- with your consent (express or implied) - other entities.

The above entities may in turn disclose your personal information to other entities as described in their privacy policies or notices.

## 5.2 Overseas

Depending on the type of personal information that we hold about you, we may hold this information in, or may disclose this information to, third party services providers located in one or more overseas countries. These service providers may be located in, or your personal information may be held in the United States and other countries.

We may also disclose your personal information to our joint venture partners or their related bodies corporate which may be located in overseas countries, including the United States of America.

Where we disclose your personal information to a service provider which is located overseas or which will hold your personal information overseas, we will take reasonable steps to ensure that the overseas recipient of your personal information handles your personal information in accordance with the standards required under the Privacy Act.

## 6.0 SECURITY

We rely on the personal information that we receive and hold to conduct our business.

We may store your personal information in different ways, including in hardcopy and electronic form. We have implemented controls around technology and our organisational processes to assist us in protecting your information from misuse, interference and loss and from unauthorised access, modification or disclosure. This includes having in place confidentiality requirements for our employees, document storage security policies, systems and site access restrictions and requiring third parties to satisfy identification requirements.

We do not sell, rent or trade personal information to or with third parties.

We may be required by law to retain certain information for a set period of time. Once this period of time expires, or where we hold personal information about you and we no longer have any need for the personal information, we will take reasonable steps to destroy, delete or de-identify your personal information in a secure manner. We expect all our employees and contractors to comply with the Privacy Act and our Privacy Policy, and will take appropriate actions to address breaches by employees and contractors of the obligations imposed by the Privacy Act and this Privacy Policy. However we do not accept responsibility for the misuse of personal information by third parties.

## 7.0 OUR WEBSITE AND SOCIAL MEDIA CHANNELS

### 7.1 Privacy when browsing our Online Platforms

This Privacy Policy also applies to your use of our website at [www.conocophillips.com.au](http://www.conocophillips.com.au) and any of our social media channels such as Facebook, LinkedIn or Twitter (**Online Platforms**) and any personal information that you provide to us via those mediums.

## **7.2 Information collected through our Online Platforms**

Some of the information that may be collected by us during your visit to our Online Platforms is not personal information, because it does not reveal your identity. For example, we may record the date and time of your visit or the pages you viewed.

If collected, this information will be used and disclosed by us in anonymous, aggregated form only, for purposes including statistical analysis and website development. However, we reserve our right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our Online Platforms, or where we are otherwise required or authorised by law to do so.

Our websites have electronic security systems in place, including the use of firewalls and data encryption. We take care to store your information in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

However, no data transmission over the internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect users' personal information, we cannot guarantee or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once we receive your information, we make every effort to ensure its security on our systems. If you are concerned about sending your information over the internet, you can contact us by telephone, email or post.

## **7.3 Cookies**

We may send a "cookie", a small summary file (containing a unique I.D. number) to your computer. This enables us to recognise your computer and greet you each time that you visit our website. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research the use of our website so that we can improve our online services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (which is the electronic address of a computer connected to the Internet) to analyse trends, administer our website, track users' movements and gather broad demographic information.

## **7.4 Links**

Our Online Platforms may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

## 8.0 COMPLAINTS HANDLING PROCESS

All privacy queries should be directed to the ConocoPhillips Australia's Privacy Officer as follows:

ConocoPhillips Australia Privacy Officer  
Human Resources  
4th Floor, 53 Ord Street  
West Perth WA 6005  
(PO Box 1102, West Perth WA 6872)  
Tel: 08 9423 6666  
Email: [PrivacyOfficer@ConocoPhillips.com](mailto:PrivacyOfficer@ConocoPhillips.com)

If you are not satisfied with how your complaint is handled, then you may lodge a formal complaint with the Office of the Australian Information Commissioner at:

- **Telephone:** 1300 363 992 (if calling from outside Australia or from Norfolk Island please call: +61 2 9284 9749)
- **National Relay Service:**
  - TTY users phone 133 677 then ask for 1300 363 992
  - Speak and Listen users phone 1300 555 727 then ask for 1300 363 992
  - Internet relay users connect to the National Relay Service then ask for 1300 363 992
- **Post:** Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- **Fax:** +61 2 9284 9666
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- **Website:** <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

## 9.0 CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time, including to comply with the Privacy Act and any amendments to it. Any updated versions of this Privacy Policy will be posted on our website at <http://australia.conocophillips.net/EN/hr/Pages/HRPoliciesListing.aspx> and will be effective from the date of posting.

This Privacy Policy was last updated on 20 April 2015.