



# Privacy Policy

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# 1 PURPOSE

The Purpose of this Privacy Policy (“Policy”) is to outline how OceanaGold and its subsidiaries collect, use and manage personal information, in compliance with applicable laws.

# 2 SCOPE

This Policy applies to all personal information we may collect from you including as a shareholder, customer, agent, supplier, contractor, advisor, financier, joint venture partner or business partner or an employee of the aforementioned entities.

If this Policy differs from local laws, OceanaGold will comply with whichever is more stringent.

# 3 PERSONAL INFORMATION PROTECTION FRAMEWORK

## 3.1 Overview

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

### 3.1.1 Personal Information Collected by the Company

The Company collects personal information as required in the course of its business to provide its products and information to customers and the community, in order to carry on its business and comply with relevant laws. If an individual chooses not to provide certain personal information to the Company, the Company may not be able to do business with that individual or their organisation, or provide them with the information they require.

The Company collects personal information from several sources in order to carry out its business. Personal information may be collected directly from an individual or, where appropriate or permissible or as generally contemplated, from a third party such as the Company’s share registry service and corporate reporting services. The Company may supplement the information it collects with information from other sources, such as publicly available databases and publications.

When the Company collects personal information, the Company will where appropriate advise the individual whose personal information is being collected as to the reason it is collecting personal information and how the Company plans to use and, if necessary, disclose the personal information. In some instances the reason for collection and proposed use of personal information will be apparent at the time the information is collected by the Company

#### 3.1.1.1 Shareholder Information

The Company collects personal information about individuals who are retail shareholders, and individuals who may be employed by or contracted to institutional shareholders.

#### 3.1.1.2 Legal Compliance

The Company may collect personal information about an individual in the course of its business as permitted by law or as required to comply with the law. For example, personal information may be collected from an individual visiting a Company site for the purpose of ensuring health and safety.

### **3.1.1.3 Enquiries by Individuals**

The Company may collect personal information in order to assist an individual with an enquiry relating to the business of the Company, such as corporate affairs or investor relations. This information may include a name, contact details, email address and details of any associated organisation.

### **3.1.1.4 Job Applicants**

The Company may collect personal information from individuals applying for a job or a contract with the Company. The collection of this personal information may be from the individual directly, or where appropriate or permissible, from a third party such as a recruitment agency, referee or publicly available sources.

## **3.2 Use of personal information**

The Company uses, discloses or otherwise processes personal information for the purpose for which it has been collected, for reasonably related secondary purposes, for purposes which have been consented to by the individual, and any other purpose permitted under the law. The Company may handle personal information in accordance with any exemptions available to it under the law.

## **3.3 Accuracy and Security of Personal Information**

The Company takes all reasonable steps to secure personal information and to keep the information accurate and up-to-date. Personal information is stored either electronically or in hard copy and appropriate security measures are in place to protect this information.

Our website does not provide facilities for the secure transmission of information across the internet. Users should be aware that there are inherent risks in transmitting information across the internet.

The Company will take such steps as are reasonable in the circumstances to destroy or de-identify personal information when it is no longer required.

## **3.4 Cross-Border Disclosure and Use of Service Providers**

The Company has operations and personnel located in several countries, including the Philippines, Canada, USA and New Zealand. The Company may use off-shore providers for the storage and processing of personal information and data, and may disclose personal information to its related bodies corporate and service providers as permitted by law. The Company will also disclose personal information where such disclosure is required by law.

The Company will take reasonable steps to ensure that any overseas recipient deals with personal information in a manner that is consistent with the law.

## **3.5 Access and Complaints**

In most instances, individuals have a right to access and request corrections to personal information held by the Company that relates to them.

If an individual wishes to access personal information held by the Company, the Company may take certain measures to verify the individual's identity before providing any details in relation to the information.

If you have any concerns or complaints regarding privacy or have any questions regarding privacy, please contact our Privacy Officer:

Attention: Privacy Officer

Email: [info@oceanagold.com](mailto:info@oceanagold.com)

Level 14, 357 Collins Street

Melbourne, VIC, 3000

Phone: +61 3 9656 5300

If the individual is dissatisfied with the Company's handling of the complaint, the matter can be raised with the Office of the Australian Information Commissioner (within Australia), the Office of the New Zealand Privacy Commissioner (within New Zealand), the National Privacy Commission (within the Philippines), and the appropriate authorities for the Company's operating entities outside of those places.

## **4 RESPONSIBILITIES AND ACCOUNTABILITIES**

The Company may, from time-to-time, update or modify this Privacy Policy and shall undertake a formal review at regular intervals. Any amendments to this Policy shall be effected by the posting of an updated version of the document on the Governance section of the Company's website.

OceanaGold's Executive Vice President, General Counsel & Company Secretary is the officer responsible for appointing the Company Privacy Officer and ensuring adherence to this Policy.

The Company's Privacy Officer is responsible for coordinating the investigation and resolution of any requests, queries or complaints relating to personal information collected, used or disclosed by the Company.

The Privacy Officer will manage any complaints received in a timely manner.

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**DOCUMENT HISTORY**

Amended on 20 April 2017