



# GOLDWIND AUSTRALIA

## GWA-CO-POL-0014 Privacy

### Policy

#### Document Approvals

Version	Date	Reason for Issue	Author	Checked	Approved
1.0	25/05/2017	First release	SS		
2.0	08/11/2019	Updated to reflect changes in the Privacy legislation and the role change of Head of Legal of Goldwind Australia	CW		
2.1	03/11/2020	Annual review – no changes	CW		
2.2	21/11/2022	Periodic review/Change to new template	BS	CW	NC
3.0	20/06/2024	AESCSFv1 SP1 Uplift	YM	Bryan Sun CW	NC
3.1	16/12/2024	Update to include Background Checks.	ABLA/GR/Ben Sasse	CW	NC



## 1. Terms and Definitions

Term / Abbreviation	Definition
Company	Goldwind Australia Pty Ltd (ABN 32 140 108 390) and its Related Bodies Corporate.
Privacy Act	Privacy Act 1988 (Cth).
Related Bodies Corporate	has the meaning given to it in the Corporations Act 2001.
'us', 'we' or 'our'	means Goldwind Australia Pty Ltd (ABN 32 140 108 390) and our Related Bodies Corporate.
Privacy Policy	refers to this document (Goldwind Australia Pty Ltd (ABN 32 140 108 390) and our Related Bodies Corporate Privacy Policy).
PI	Personal Information.

## 2. Policy statement

Our Privacy Policy sets out how we collect, use, store and disclose your personal information. We are bound by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). We are committed to respecting your privacy.

By providing personal information (PI) to us, you consent to our collection, holding, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

## 3. Scope and coverage

### What is 'PI'?

PI includes information or an opinion collected about an identified individual or an individual who can be reasonably identified from the collected information. For example, this may include your name, age, gender, postcode, and contact details. Information or an opinion may be PI regardless of whether it is true.

### What PI do we generally collect?

We may collect the following types of PI about you:

- contact details, including your name, mailing or street address, email address, telephone number and other contact details;
- land and property information, including lot, deposited plan, title, price and address;
- financial details, including bank account numbers;
- details of the technology, products, and services that we have provided to you or that you have enquired about, including any additional information necessary to deliver those



- technologies, products and services and respond to your enquiries; and
- any other PI that may be required to facilitate your dealings with us.

We may collect these types of PI either directly from you, or from third parties.

We may collect this information when you:

- engage us to provide you with any technology, products or services;
- communicate with us through correspondence, chats, email, or when you share information with us from other applications, services or websites;
- enter into an arrangement with us in which you option, lease, license or otherwise deal with your land with us;
- interact with our sites, services, content and advertising;
- invest in our business or enquire as to a potential purchase of all or part of our business;
- acquire a renewable energy asset from us; or
- enter into an arrangement with us for the supply of wind turbines.

#### **PI collected for work requirements**

In addition, when a person applies for a job or to otherwise applies to work with us (for example, when a person applies to work with us as an independent contractor, or subcontractor to an independent contractor engaged by us), or when a person requires access to our business, we may collect the following additional information:

- identification information, including age or date of birth, nationality, and gender;
- identity verification information, including driver's licence number, copy of driver's licence, motor vehicle registration number, vehicle plate number, tax file number, birth or citizenship certificate, passport number, visa transaction reference number (for employees who need visas to work in Australia) and photographs;
- medical records collected as part of any recruitment process;
- information about your curriculum vitae, education and working history, including current and past position title and qualifications, resume details, and training history; and financial information, including bank account details.
- criminal history and disclosable court outcomes.

We may collect this information from recruitment consultants, your employers, organisations that provide labour hire services and others who may be able to provide information to us to assist in our engagement of you as an employee, contractor, or subcontractor. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

If you are listed as a reference for a person who has applied to work with us or access our business, we may collect your PI from the person who has provided that information and is the subject of that application.



### Why do we collect criminal history and disclosable court outcomes information?

We have a range of obligations which give rise to a requirement for us to conduct criminal history and disclosable court outcomes checks on employees, contractors, and prospective employees and contractors.

In addition to Goldwind's obligations to clients working in the mining sector and other similar industries, as a provider of energy in Australia, Goldwind is required under the *Security of Critical Infrastructure Act 2018* (Cth) ('**SOCI Act**') to comply with Critical Infrastructure Risk Management Programs ('**CIRMP**') which are intended to uplift core security practices that relate to the management of certain critical infrastructure assets.

Goldwind is required by law to adopt, maintain, comply and review our CIRMP and take a holistic and proactive approach towards identifying, preventing and mitigating risks (including with respect to personnel). As part of our CIRMP and obligations under the SOCI Act, we require all critical employees to undergo a background check which provides us with information relating to past criminal history and disclosable court outcomes. Background checks are completed by third-party agents and information obtained via our background check process may be shared with any individual, entity, organisation or Government body related to your employment subject to this policy, the terms of any relevant contract of employment and all relevant privacy laws.

Background checks will be completed on an 'as needed' basis depending on the requirements and characteristics of a particular role.

Workers may be subject to periodic background checks. Where an employee commences a new position, we may direct them to undergo a further background check in order to meet our obligations and comply with the CIRMP.

If, following the completion of a background check, we become aware of any past criminal history or disclosable court outcomes that is relevant to a current or prospective worker's capacity to perform their role or to our broader legal obligations, we reserve the right to take lawful appropriate steps which may include refusal to offer further work/employment, withdrawal of any offers of work/employment or termination of a current worker's employment/engagement.

We will assess disclosable outcomes in line with contractual and regulatory obligations and engage with affected workers as required.

### What PI do we collect for the purposes of random alcohol and drug testing?

We also randomly conduct alcohol and drug testing on some of our workforce. If you work as:

- a contractor engaged by us;
- a subcontractor of a contractor engaged by us;
- an employee of such a contractor or subcontractor; or



- any other person engaged by us to assist in delivering our technology, products or services.

We may require you to provide us with additional PI (including sensitive information, such as health and other medical information) for the alcohol and drug testing. We will only collect your sensitive information if it is reasonably necessary for our functions or activities, and we will always obtain your consent before doing so.

### **Why do we collect, hold, use and disclose PI?**

We may collect, hold, use and disclose your PI for the following purposes:

- to contact and communicate with you;
- to provide technology, products and services to you;
- to consider your employment application and verify your suitability to work with us or access our business;
- to make payments to you for goods or services that you provide to us, including paying you remuneration and other benefits and entitlements;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you; and
- to comply with our legal obligations including (but not limited to) our CIRMP under the SOCI Act;
- to resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

### **How do we store and hold PI?**

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect PI which we hold from misuse, interference, or loss, and from unauthorised access, modification, or disclosure.

These processes and systems include:

- the use of identity and access management technologies to control access to systems on which information is processed and stored;
- requiring all employees to comply with internal information security policies and keep information secure;
- requiring all employees to complete training about information security; and
- monitoring and regularly reviewing our practice against our own policies and against industry best practice.

### **To whom do we disclose your PI?**

We may disclose PI for the purposes described in this Privacy Policy to:



- our employees and Related Bodies Corporate;
- third party suppliers and service providers (including providers who assist us to operate our business and provide our technology, products and services to you);
- professional advisers, dealers, agents and business partners;
- payment systems operators (e.g., merchants receiving card payments);
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies, and law enforcement agencies, or as required, authorised or permitted by law.

We may also disclose your PI to others where:

- you may have expressly consented to the disclosure, or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

In addition, when we collect your PI as part of an alcohol or drug test, we may communicate or collect your PI (including sensitive information) in our dealings with relevant third parties including alcohol or drug detection and collection agencies, laboratories, toxicologists, and medical rehabilitation officers (such as, doctors). We may also disclose this PI (including sensitive information) to the contractor or business that employs or hires you to work for us.

#### **Disclosure of PI outside of Australia**

We may disclose PI outside of Australia to our Related Bodies Corporate.

Our Related Bodies Corporate are likely to be located in New Zealand, Indonesia, China, USA, Thailand, Pakistan, Turkey, South Africa, Brazil, Argentina, and South Korea.

We will either:

- take reasonable steps to ensure that any overseas recipient will deal with such PI in a way that is consistent with the Australian Privacy Principles; or
- form a reasonable belief that the overseas recipient is subject to laws substantially similar to the Australian Privacy Principles and affected individuals may enforce those laws.

#### **Using our website and cookies**

We may collect PI about you when you use and access our website. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.



## Security

We may hold your PI in either electronic or hard copy form. We take reasonable steps to protect your PI from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your PI.

For example, we:

- store hard copies in locking cabinets or password cabinets which are accessible to permitted staff inside the Company;
- ensure all Company computers are password protected; and
- apply active monitoring and security measures to external traffic.

Although we take these reasonable steps, we cannot guarantee the security of your personal information.

## Links

Our website may have links to websites run by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## Accessing or correcting your PI

You can access the PI we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all your PI and, where this is the case, we will tell you why. We may also need to verify your identity when you request your PI.

If you think that any PI we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

## Making a complaint

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your PI, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.



## 4. Purpose and Intended Outcomes

A privacy policy is required for Goldwind to ensure compliance with the Privacy Act. This Privacy Policy addresses how we collect, use, store and disclose your PI.

## 5. Evaluation

### Changes to this Policy

Occasionally we may change our Policy on how we handle PI or the types of PI which we hold. Any changes to our Privacy Policy will be published on our website.

You can obtain a copy of our current Privacy Policy from our website or by contacting us at the contact details below.

### Contact Us

For further information about our Privacy Policy or practices, or to access or correct your PI, or make a complaint, please contact our Privacy Officer using the details set out below:

Charlie Williamson  
Head of Legal  
Suite 2, Level 25, Tower 1, 100 Barangaroo Ave, Barangaroo NSW 2000.  
T.+61 2 9008 1757  
[goldwind.legal@goldwindaustralia.com](mailto:goldwind.legal@goldwindaustralia.com)

If you are dissatisfied by how we handle your information, you can also send your complaint to the Office of the Australian Information Commissioner. The Commissioner can be contacted at:

Office of the Australian Information Commissioner ("OAIC")  
GPO Box 5218  
Sydney NSW 2001  
Telephone: 1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

## 6. Related information

Privacy Act 1988 (Cth) [http://www.austlii.edu.au/au/legis/cth/consol\\_act/PA1988108/](http://www.austlii.edu.au/au/legis/cth/consol_act/PA1988108/)



## 7. Appendices

### 7.1. AESCSFv1 SP1 Mapping

The following table is a mapping between relevant AESCSFv1 SP1 practices and the clauses in this Procedure.

Practice ID	Practice Name	Clause No.	Security Profile
APM-1A	Privacy requirements applicable to the organisation have been identified, even in an ad-hoc manner.	2	SP-1
APM-1B	The organisation has defined what it considers personal information in the context of its business activities, even in an ad-hoc manner.	3	SP-1
APM-1C	There is a point of contact (person or role) to whom privacy issues could be reported, even in an ad-hoc manner.	5	SP-1
APM-1D	Business activities which involve the collection, processing, storage or transmission of personal information have been identified	3	SP-1
APM-AP1	The function is unaware whether personal information is collected	3	SP-1

### 7.2. Site Specific Privacy Policy

[Insert Site Specific Policy Here]

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Signature:



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Ning Chen  
CEO

Dec 18, 2024

Effective Date: \_\_\_\_\_