

## Privacy Policy

Cubico Sustainable Investments Australia Pty Ltd (ACN 624 996 078) (Cubico) and the Middle Creek Energy Hub Project respect your privacy and are committed to upholding best practices regarding protecting your data, including how we collect, use, disclose, store, secure, and dispose of your personal information.

We are committed to complying with the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988 (Cth)* (the Privacy Act). The APPs govern how we collect, use, disclose, store, secure, and dispose of your personal information.

A copy of the Australian Privacy Principles can be obtained from the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

This Privacy Policy aims to give you information on:

- the types of personal data that we will collect.
- why we will collect and use your data;
- when and why, we will share personal data with other organisations;
- the rights and choices you have when it comes to your data, and
- why and how we collect and process your data through your use of our website, including any data you may provide through our website when you use any of our services or interact with any of our projects and to anyone else who contacts or otherwise submits information to us.

This website is not intended for children, and we do not knowingly collect data relating to children.

Please take the time to read this Privacy Policy. If you have any questions about it or our use of your information, you can contact us using the details found at the end of this Privacy Policy.

### 1. What is Personal information, and why do we collect it?

- (a) Personal information is information or an opinion that identifies an identified individual, or individual who is reasonably identifiable, in accordance with section 6 of the Privacy Act.
- (b) We collect both identifiable and non-identifiable information about you.
- (c) Examples of identifiable information we may collect include your name, address, email address, phone and facsimile numbers, quotes and opinions, the history of your interactions with us, and your preferences, interests, behaviour related to services and activities (including through our website).
- (d) In the event you do not provide us with access to requested identifiable personal information, we may not be able to provide to fulfil one or more of our functions and activities applicable to you.
- (e) Non-identifiable information is data that is not labelled with an individual's identity, or by which no specific individual can be identified. When you access our site, our systems may automatically record non-identifiable information that your browser sends. This data may include IP addresses, browser type, web pages you access while visiting our site, time spent on those pages, items, the information searched on our site, access time, date and other statistics. The data is collected for analysis and evaluation in order to help us improve our site and the services provided.

- (f) There are numerous ways in which we collect information from you and about you, including but not limited to:
- i. interviews.
  - ii. correspondence by telephone, facsimile, email.
  - iii. via our corporate website or associated project websites.
  - iv. surveys.
  - v. public community sessions.
  - vi. interacting with us on social media.
  - vii. having a conversation with our team.
  - viii. email newsletter sign-up forms.
  - ix. other publicly available sources.
  - x. and from third parties such as our related entities, business or commercial partners.
- (g) We do not guarantee website links or the policy of authorised third parties.
- (h) In using our services and by providing your personal information to us, you agree that, where it is permitted by the Privacy Act or where you have expressly agreed to receive these communications from us, we may use the information to:
- i. provide information to our stakeholders and communities within our areas of operation.
  - ii. provide services or other functions to you.
  - iii. enter into a contract with you regarding our projects (including leases, land use agreements, easements, or other contracts).
  - iv. ensure legal compliance. If the law or any regulator in any competent jurisdiction requires us to do so, we may need to collect and process your data and provide it to such regulators.
  - v. assess any employment or contract work application during the recruitment or procurement processes.
  - vi. respond to enquiries.
  - vii. improve our service offerings.
  - viii. improve our communications.
  - ix. provide you with helpful information, news and updates.
  - x. notify you of our new services.
  - xi. seek your views on our services.
  - xii. our own administrative and quality assurance purposes; and/or
  - xiii. other purposes that may be detailed on this website.
- (i) We collect your personal information to provide our services to you and provide information to our clients, stakeholders, and communities, and for marketing (primary purpose). We may also use your personal information for secondary purposes closely related to the primary purpose in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists anytime by contacting us in writing.

- (j) When we collect personal information, we will, where appropriate and possible, explain to you why we are collecting it and how we plan to use it.

## 2. Principles

In using your personal information, we abide by the following principles:

- (a) **Limitation:** We will only collect personal information about you that is necessary for one or more of our legitimate business purposes or is required by law. In addition, we will only collect personal information by lawful and fair means and not in an unreasonably intrusive manner.
- (b) **Purpose:** When we collect your personal data, we will take reasonable steps to advise you of what personal data we are collecting, the purposes for which we are collecting the information and will use such information only for stated primary purposes or directly related secondary purposes.
- (c) **Disclosure:** We will advise you of the organisations (or types of organisations) to which we may disclose that personal data, and we will provide you with contact information in the event you would like access to your personal data we hold about you or if you need to update your personal data or preferences.

## 3. Third party

- (a) Where reasonable and practicable, we will collect your personal information only from you. However, in some circumstances, we may be provided with information by third parties. In such a case, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.
- (b) We may share your Personal Information within Cubico.
- (c) When we share your information with third parties, they will process your information either as a data controller or as our data processor, and this will depend on the purposes of our sharing your data with such third parties. We will only share your data in compliance with the applicable data protection laws and regulatory requirements.
- (d) We may share broader statistics and customer profiling information with third parties and within Cubico. However, the information or data will be anonymised, so you will not be identifiable from that data. We will not rent or sell your data and information details to any other organisation or individual.

## 4. Third-party links

The Cubico website and any associated project websites may contain links to third-party advertisers, affiliates, websites, plug-ins, and applications. By clicking on these links or enabling connections, you may allow third parties to collect or share data about you. We do not oversee these third-party websites and do not bear responsibility for their privacy statements, notices, or policies. As you navigate away from our website, we advise you to review the privacy notice of each website you visit. We do not assume any responsibility or liability for third-party websites' privacy policies or notices. Before providing personal data to these websites, please review their policies.

## 5. Disclosure of Personal information

- (e) Your Personal information may be disclosed in several circumstances, including the following:
- i. **Affiliates:** We may disclose personal data to our affiliated companies for the purposes described in this Privacy Policy. Affiliates are those companies that are under common control of Cubico.
  - ii. **Third Parties:** We may use third parties to provide services to us which may require disclosure of your personal data.
  - iii. **Law enforcement:** In certain circumstances, we may be called upon to release your personal data in response to a court order, subpoena, search warrant, law, or regulation. We plan to cooperate in responding to such requests, taking appropriate measures to ensure that the requester understands the sensitive nature of the personal data that they may receive. We also reserve the right to cooperate with law enforcement authorities in investigating and prosecuting users who violate our rules or engage in behaviour that is illegal or harmful to individuals or the personal data we are responsible for; and
  - iv. **Corporate transactions:** We may disclose your information to a third party in connection with corporate reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock, including in connection with any bankruptcy or similar proceedings.

## 6. Cookies and other technology

- (a) Cubico uses a variety of technologies to personalise your experience and to deliver online content tailored to your interests, such as internet tags and cookies.
- (b) We collect information about your use of our website through cookies and similar technology. Cookies are small text files that are placed on your computer or another web-accessing device by this website that allow us to recognise you and maintain your preferences when you return to our website. These cookies allow us to distinguish you from other users of this website, to enhance this website and your experience when you browse this website.
- (c) Cookie technology collects data, which does not include personally identifiable information, but which reflects your activities on the website and helps us to customise our website experience and anticipate what may be of interest to our users, by monitoring traffic in popular areas and modifying the services and information to meet customer demand.
- (d) We use cookies on our website to:
- i. direct users to the relevant sections on the website;
  - ii. make sure the website has a consistent look across different browsers and devices;
  - iii. enable complex areas of the website to function; and
  - iv. track aggregated statistics about visits to the website to help us improve website performance.
- (e) We do not allow other websites or third parties to use our cookies for their own purposes on your computer when you visit our website.
- (f) We may update the Cookies Policy for our website. We, therefore, recommend that you re-read this policy every time you access our website so that you are adequately informed about how and why we use cookies.

## 7. Security of Personal information

- (a) Your Personal information is stored in a manner that reasonably protects it from misuse, interference, loss, and unauthorised access, modification, or disclosure. The security measures we use to protect all personal data are designed to meet or exceed industry standards to prevent intruders from gaining access, however you should be aware that no security measure is guaranteed to be 100% secure and you should always take appropriate security measures to protect your personal data, including ensuring that you have up-to-date antivirus software.
- (b) In the unlikely event of a data breach relating to personal information we hold about you, we will take all reasonable steps to contain and remedy the effects of the breach. If required by the Privacy Act, we will assess the breach and notify both you and the Office of the Australian Information Commissioner as soon reasonably possible after becoming aware of the breach.
- (c) When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify it in accordance with APP 11. However, most Personal information is or will be stored in client files, which we will keep for a minimum of seven years.

## 8. Access to your Personal information

- (a) You may access the personal information we hold about you and update and correct it, subject to certain exceptions. If you wish to access your personal information, please contact us in writing at the contact details found at the end of this Privacy Policy.
- (b) Cubico will not charge any fee for your access request.
- (c) We may require your identification before releasing the requested information to protect your Personal information.

## 9. Maintaining the quality of your Personal information

It is important to us that your personal information is up to date. We will take reasonable steps to ensure that your personal information is accurate, complete, and current. If you find that the information we have is not up to date or inaccurate, please advise us as soon as practicable so we can update our records and continue to provide quality services to you.

## 10. Policy updates

We reserve the right to change the terms of this Privacy Policy at any time (for example due to changes in data protection laws) by posting revisions to our website.

## 11. Privacy Policy complaints and enquiries

If you have any queries or complaints about our Privacy Policy, please contact us at:

Email: [middlecreek@cubicoinvest.com](mailto:middlecreek@cubicoinvest.com)

Phone: 1800 282 426