

PRIVACY POLICY

This privacy policy (the **Policy**) sets out in accordance with the *Privacy Act 1988* (Cth) the way in which Trustpower Limited and its associated entities (together **Trustpower, we, us, or our**) may collect, store, use, manage and protect your Personal Information. This Policy incorporates the requirements of the Australian Privacy Principles (**APPs**) in Schedule 1 to the *Privacy Act 1988* (Cth) (**Privacy Act**), which came into effect on 12 March 2014.

By:

- a. using this website;
- b. accessing, requesting, or enquiring about information relating to Trustpower's operations in Australia (either online or in person);
- c. entering into, or negotiating, a contract or any other form of deed or agreement with Trustpower; or
- d. providing Personal Information to Trustpower, its officers, agents or employees

after this Policy has been brought to your attention (eg, by us providing a copy of this Policy with a proposed contract or other document, or by notifying you of the availability of this Policy in the privacy notice contained in our emails or letters), you acknowledge and consent to the use, collection, storage or disclosure of your Personal Information by us in accordance with this Policy and the *Privacy Act*.

If you **do not** agree to our handling your Personal Information in the manner set out in this Policy you must immediately cease to access this website, and you should not provide us with any of your Personal Information.

1. What is Personal Information?

We follow the definition of Personal Information given in the *Privacy Act*:

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.

2. What kinds of Personal Information might we collect and hold?

We may collect (and hold) different Personal Information from you depending upon how you interact with us.

If you access our website, we may collect information about how you have used our site.

If you contact us, we may collect details which include, but are not limited to, your name, address, e-mail address and phone number.

We may also collect information about:

- a. your demographic (e.g. your age, gender, vocation, educational history);
- b. your land holdings and how you use your land;
- c. your interests;
- d. your views on our activities;
- e. our bilateral interactions;
- f. any rent or royalties that we pay to you;
- g. conditions on the land you own;
- h. your location;
- i. the technology you use to access our services;
- j. how and when you use our services; and
- k. government identifiers, such as your driver's licence numbers.

3. How do we collect Personal Information?

We collect Personal Information:

- a. directly from you (when we contact you, when you contact us, when we enter into deeds or agreements with you, when we visit you or your properties, when you attend events arranged or sponsored by us, visit our sites, wind farms or other installation or facilities, when you post about us on social media, when we engage in

- community consultation, when you enter a competition);
- b. from publicly available sources and databases (where it is unreasonable or impractical for us to collect the Personal Information directly from you, such as where we have provided you with a reasonable opportunity to provide Personal Information which we reasonably require for our activities, but you have not provided some or all of it);
- c. through statutory, regulatory and other governmental processes; and
- d. from third parties who you have authorised to provide us with Personal Information.

If we receive unsolicited Personal Information, we will assess whether we would have been entitled to collect that Personal Information and, if not, destroy or de-identify that Personal Information.

4. How do we hold and secure your Personal Information?

We will take all reasonable steps to protect the Personal Information we collect from misuse, interference, loss, unauthorised access, modification or disclosure. We maintain physical, electronic, and procedural security measures to safeguard Personal Information including:

- a. use of appropriate computer system and network security;
- b. contracts with all partners with which we exchange information protecting the confidentiality and integrity of Personal Information;
- c. contingency plans assessing critical system functions and establishing data backup, disaster recovery and emergency mode operations plans;
- d. formal, documented policies and procedures for receipt, storage, processing and distribution of information, ensuring its security;
- e. information access controls, including policies and procedures for access authorisation to the system and the various kinds of data it contains;
- f. internal information system auditing policies and procedures;

- g. documentation of system and data authorisations and access, documented security clearance policies and procedures, and security training for affected staff;
- h. documented policies and procedures for the control of the media on which information is stored, including activity tracking and data backup, storage and disposal; and
- i. access controls, which may be (i) context- (ie. transaction) based, (ii) role-based, or (iii) user-based.

We may store your Personal Information in Australia, in New Zealand or in other overseas countries, either at one of our companies' offices, or with a third party cloud storage provider (which may have servers in countries other than Australia and New Zealand). Where we do so without your prior consent, we will take reasonable steps to ensure that the overseas recipient does not breach the APPs unless, the security measures applied in those countries or by those parties are equivalent to or better than the measures which we use.

5. Why do we collect, hold, use and disclose Personal Information?

We may collect Personal Information for a number of reasons, including:

- a. assessing the potential to do business with you;
- b. managing our relationship with you;
- c. providing you with information about our activities;
- d. developing and making proposals to you;
- e. developing community relationships;
- f. stakeholder engagement;
- g. internal business purposes;
- h. providing you with marketing material;
- i. contacting you in relation to our business activities;
- j. better understanding our stakeholders, clients and customers;
- k. tailoring our marketing, services, promotions and operations;
- l. corporate governance, auditing and record keeping;
- m. police checks and searches of court or other public records, where reasonably necessary in connection with our business activities; and
- n. in connection with obtaining government or other approvals, such as from Foreign Investment Review Board, local councils or government departments responsible for various aspects of the regulation of energy generation and distribution.

Our use of Personal Information may extend beyond these uses, but will be restricted to purposes that we consider to be related to our functions and activities.

6. What do we do with your Personal Information?

If we collect Personal Information from you, we may:

- a. use that information for any of the purposes in clause 5 of this Policy;
- b. store that information in accordance with this Policy;
- c. pass that information amongst entities we work with, including our joint venture partners;
- d. pass that information to third parties who provide products or services to us (including our accountants, auditors, lawyers, IT contractors, project managers,

environmental consultants, engineers, construction contractors, and other suppliers and service providers); or

- e. provide that information to governmental authorities and other third parties as required by law.

7. Do you use my information for Direct Marketing?

We may use your Personal Information to communicate directly with you to promote a product or service (**Direct Marketing**). We use Direct Marketing to provide you with information about Trustpower products, services or developments that we believe you may be interested in. If you receive Direct Marketing material from us, and do not wish to continue receiving it, please contact us by any of the methods set out in paragraph 13 below, asking to be removed from all future Direct Marketing programs. Once we have received your opt-out request, we will remove you from our Direct Marketing programs as soon as reasonably practicable.

8. What about Cookies?

When you access our website, we may receive information about you via a 'cookie'. A cookie is a piece of information that our web server may send to your computer when you visit the website. The cookie is stored on your machine, but does not identify you or give us any information about your computer. A cookie helps us to recognise when you re-visit the website, and to optimize your experience. We do not collect any Personal Information from you when you use cookies on our website.

9. Do we ever send your information overseas?

Trustpower Limited is headquartered in New Zealand. As part of the management of our operations, Personal Information may be held by one or more of our operating companies in either New Zealand or Australia (or both), as well as on servers in overseas countries owned by our cloud services providers. We will ensure that your Personal Information is treated in accordance with this Policy.

10. Can you access your Personal Information or request it be corrected?

We will take reasonable steps to ensure Personal Information we collect and use is accurate, up-to-date and complete. We encourage you to update and correct any of Personal Information we hold.

- a. You may request access to the Personal Information that we hold about you by contacting us by any of the methods as set out in paragraph 13, below (an **Access Request**).
- b. Upon receiving an Access Request we may request further details from you to verify your identity. We reserve the right not to provide you with access to Personal Information if we cannot verify your identity to our reasonable satisfaction.
- c. An administrative fee may be charged to cover our costs in providing you with access to your Personal Information. This fee will be explained to you before it has been incurred.
- d. We will respond to your Access Request within a reasonable period of time by:
 - i. providing you with access to your Personal Information;

- ii. rejecting your Access Request, and providing you with reasons for this rejection.
- e. Access Requests may be denied where:
 - i. we believe your request is frivolous or vexatious;
 - ii. we are entitled to reject it by law;
 - iii. we are unable to verify your identity; or
 - iv. you have not paid the administrative fees referred to in paragraph 10c, above.
- f. If you believe that the Personal Information that we hold is inaccurate or otherwise requires correction, you may send us a correction request by contacting us by any of the methods as set out in paragraph 13, below. We will review your Personal Information and respond to the request within a reasonable period of time.

11. What happens if you want to deal with us anonymously or using a pseudonym, or if you otherwise provide us with incomplete Personal Information?

You can deal with us either anonymously or by using a pseudonym if you choose. If, however, you do so we may not be able to provide you with accurate or useful information, and (in some circumstances) you may not be able to access a full range of our products and services. For example, we may not be able to process your request, provide a definitive response, assess your suitability for a position or your eligibility as a landowner for entry into access agreements, or we may need to ask you further questions and require more time to respond.

12. Does this Policy ever change?

From time to time we may make changes to this Policy. When we do, we will highlight those changes in **bold**. Changes come into effect from the time when they are brought to your attention, or when you next log onto our website, whichever is earlier. Please make sure you review this Policy each time you visit our website to keep up to date on any changes.

13. What happens if you have a question or complaint about how we have handled your Personal Information?

If you have a question or complaint, you can raise it with us by:

Emailing privacy@trustpower.com.au;

Calling us on 1800 122 823;

Sending a letter to GPO Box 1512, Adelaide, SA 5001.

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious.

If you aren't satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.