

Global Privacy Notice for BHP Workers

For Spanish or Bahasa Malay versions, please contact dataprivacy@bhp.com.

1. Introduction

Protecting your privacy is very important to us. The Privacy Notice and Workplace Technology Monitoring Notice (“Notices”) set out how BHP collects and processes your personal information. It also sets out your rights in relation to the personal information we hold about you. If you have questions about the Notices, please contact the BHP Data Privacy and Data Ethics Office at dataprivacy@bhp.com.

What do the Notices do?

This Privacy Notice describes how BHP deals with personal information about everyone that works for BHP – this includes directors, employees and contractors (for example labour hire, agency and temporary workers, secondees).

The Workplace Technology Monitoring Notice explains the kinds of monitoring procedures that BHP may carry out across BHP’s workplaces and technology, why we do this, and how it complies with all applicable laws in the places where we operate our business (see [BHP Workplace and Technology Monitoring Notice](#) for more details).

For the purposes of the Notices, “**personal information**” means any information about an identified or identifiable person. This includes where you can be identified, directly or indirectly, including by reference to an identifier (for example, a name or email address, or an online identifier such as a unique device identification number). We use the words “**process**” and “**processing**” to describe the various things we may do with your personal information – including using, disclosing, holding, recording, storing, transferring or otherwise handling that information.

Unless otherwise stated in Section 7 (*Country-specific rules*), the Notices do not form part of your contract of employment or contract of engagement (as applicable). The Notices may be updated from time to time as set out in Section 9 (*Updates to the Notices*). If you have a question about the Notices, please contact us as outlined in Section 10 (*How you can contact us*).

Who does the Notices apply to?

The Notices apply to:

- everyone who works for BHP (“**you**”); and
- BHP Group Limited of 171 Collins Street, Melbourne, Victoria 3000, Australia, BHP Group Plc of Nova South, 160 Victoria Street, London, SW1E 5LB, UK, BHP Marketing Asia Pte Ltd of 10 Marina Boulevard, #07-01 Marina Bay Financial Tower, Tower 2, Singapore 018983) and all subsidiaries within the BHP group of companies worldwide (together “**BHP**”, “**we**”, or “**us**”).

2. Types of personal information we collect

We collect and process different types of personal information depending on how you interact with us. In some cases, this may include information that shows who you are and/or is linked to you as a result of your work with BHP. We may also need to collect sensitive personal information about you (such as medical details).

How we collect personal information

We will primarily collect personal information from you either directly (such as when you apply to work for us) or indirectly from your interactions with us (such as by monitoring your use of our IT systems). In some cases, we may also need to collect personal Information about you from third parties (such as recruitment agencies and government agencies).

Types of personal information we collect

The types of personal information that we collect about you may include:

- **Identification data** – such as your name, gender, photograph and date of birth.
- **National identifiers** – such as your passport details, immigration / visa status, and any government-issued identifiers.
- **Contact details** – such as your home and business address, email address and mobile telephone number. This may also include contact details of your next of kin and other third-parties such as emergency contacts, dependants and life insurance beneficiaries.
- **Recruitment records** – such as your work application form, resume or CV, interview notes, references and results of any psychometric tests and background checks (including criminal records checks).
- **Worker records** – such as your employee number, position name, office location, employment contract, attendance records, health and fitness assessments and sickness and other absence records, health and safety records, performance records, skills records, training records and records of projects you have worked on, termination / resignation details, transfers and secondments.
- **Background, education and qualification information** – such as your qualifications, education details, employment and career history.
- **Financial information** – such as banking information, tax information, salary, benefits and pension details and payments records.
- **IT information** – this includes information required to provide access to our IT systems and networks (such as login information, IP addresses), and records of your use of those systems, devices and networks, such as laptop, telephone, email and internet use (see [BHP Workplace and Technology Monitoring Notice](#) for more details).
- **Biometric information** – such as information collected by fatigue monitoring systems to keep our workforce safe.
- **Other information** – such as access and attendance to BHP premises and physical assets (such as security records about times of entry and exit, and information collected through CCTV), details about your use of our assets (such as when you are driving a BHP vehicle), communications with you (including complaints or concerns raised by you) and other information you voluntarily provide to BHP (such as where you register for a particular activity).

Sensitive Personal Information

Some types of personal information are considered to be more private than others (which, depending on jurisdiction, includes information about someone's racial or ethnic origin, political opinions, religious beliefs or affiliations, health or medical conditions, genetic information, biometric information, sexual orientation, criminal record, trade-union membership and political association membership). This type of information is called "sensitive personal information".

Sometimes we may need to collect sensitive personal information about you (for example, we may need you to undertake medical tests in order to assess your fitness for work), but we will only do this as described in section 3 (Why we process your personal information) below.

3. Why we process your personal information

We process personal information to conduct our business – this includes managing your working relationship with us, managing our global workforce, managing our contractual relationships, managing safety and security risks, and complying with legal obligations. We also process sensitive personal information where you have provided your consent, or it is necessary to comply with legal obligations.

The purposes for which we process your personal information will depend on the type of personal information collected and the context in which it was collected. However, the primary purposes for which we process personal information include:

- **managing your working relationship with us** – this includes processing your personal information as part of the recruitment process and to ensure that we can manage your contract for ongoing work for us such paying your salary and managing your on-going engagement with us (including your performance);
- **managing our global workforce** – this includes processing your personal information as part of workforce and financial management/planning, managing our IT system and investigating breaches of law and our internal policies/procedures (including in relation to use of our communications and IT systems), use of CCTV for programming and tracking work;
- **managing our contractual relationships** – this includes managing, and fulfilling, our contracts with customers, suppliers and third parties;
- **managing safety and security risks** – this includes managing and monitoring access to our sites; safety and security at our sites (including through the use of CCTV and fatigue monitoring); our IT environment (including monitoring electronic communications – see [BHP Workplace and Technology Monitoring Notice](#)); and the health of our workers (including through medical testing and treatment); and
- **legal obligations** – this includes meeting obligations imposed under law; compliance with local regulatory obligations, investigating breaches to our Code of Conduct, responding to lawful requests from governments and public authorities and responding to potential or actual litigation.

We may also collect and process your personal information for any other purposes for which you have provided your consent or if there is another lawful basis for doing so.

If we do not collect your personal information, it may affect our ability to perform these functions and, as a consequence, our ability to engage you to work for us.

Sensitive personal information

As flagged above, sometimes we may need to collect and process sensitive personal information about you, but we will only do this:

- where you have explicitly provided your consent (including where you have consented to a third-party providing health services at the request of BHP or where you provide us with a doctor's letter (for example in support of an application for sick leave));
- where necessary to comply with our legal obligations as an employer – such as where necessary for the purposes of legally mandated medical assessments, ongoing health monitoring, or to comply with anti-discrimination laws and government reporting obligations; or
- where otherwise permitted by applicable laws and regulations.

4. With whom we share your personal information

We may share your personal information within our corporate group as well as with third parties involved in the running of our business and your authorised representatives. This may involve sharing information across national borders.

Disclosures within our corporate group

We may share your personal information (which may sometimes include sensitive personal information) within our corporate group who require the information for the purposes in the Notices. This will include sharing your personal information with BHP entities in countries other than where the information was originally collected. Sharing of this information within our group is governed by a data transfer agreement that we have in place with all relevant BHP entities.

An overview of BHP's global corporate group and the countries in which BHP entities operate can be found in BHP's Annual Report (www.bhp.com/investors/annual-reporting). Some members of our corporate group also perform shared services for other BHP entities. As a result, your personal information (which may sometimes include sensitive personal information) may be processed by BHP's shared services centres based in Malaysia and the Philippines.

Disclosures outside our corporate group

We may also need to share your personal information (which may sometimes include sensitive personal information) with:

- people you have authorised to interact with us on your behalf (such as recruitment agencies);
- third parties who provide services we use to run our business (such as external service providers that assist BHP to perform HR and other shared services functions, that provide IT services, or that provide security for BHP sites or systems);
- prospective purchasers of all or part of our business or of any shares in BHP entity;
- our professional advisors (such as our lawyers and accountants); and
- government authorities or other persons where obliged to do so by an applicable law.

If we need to disclose personal information to third parties in a different country to where the information was collected, we will take steps to ensure that there is a lawful basis for the

disclosure and that the disclosure complies with all applicable laws. This may include entering into a legally binding contract with the recipient under which they are obliged to handle your information in accordance with applicable laws and BHP data privacy and security standards.

5. How we store and protect your personal information

We take steps to ensure that your personal information is kept secure and protected against unauthorised access or use. We only keep your personal information for as long as we need it to carry out the purposes described in the Notices.

Information security

We take the privacy of all our people very seriously and we have put in place procedures and technologies to maintain the security of your personal information from the point of collection to the point of destruction. For example, access to personal information by our workers is on a “need to know” basis where there is a legitimate business need for access. We also deal with personal information in accordance with our *Information Security Framework* which can be found at [Technology and Cybersecurity Global Standard](#).

- We also take steps to ensure that all our workers are aware of, and are properly trained, through applicable information security policies and procedures that are designed to keep your personal information secure. We will investigate and take appropriate action if we become aware of any failure to comply with these policies and procedures.

Storing personal information

Most of the personal information that we collect is stored in a multitenant cloud infrastructure managed by third party providers. We also store some information in databases hosted in our data centres in Australia (Perth) and Chile (Santiago). We take reasonable steps to protect your personal information against unauthorised access, use or disclosure and require our third-party cloud providers to comply with our policies and procedures or implement appropriate information security measures, including storing data in locations that can guarantee adequate privacy and security measures of your personal information.

We also use third parties to store and process your personal information. However, we only do this when the party agrees to comply with our procedures and policies or if they put in place equivalent security measures.

Information retention

Our aim is to keep personal information for no longer than is necessary for the purposes described in the Notices or as otherwise required by law. Generally, this means your personal information will be retained for the period of your employment or work relationship with us, plus a reasonable time period afterwards where necessary to fulfil all of our commitments to you (e.g. to calculate any final work benefits), to address ongoing work-related issues (e.g. any ongoing disciplinary claims), or deal with any legal matters.

6. Your rights and choices

You have rights relating to your personal information held by BHP. Let us know if you want to correct your personal information or if you have concerns about how we are handling your personal information.

Your Rights

You have certain rights in relation to your personal information that we hold about you, though the details of these may vary depending on the country where you are based. We respond to all requests we receive from individuals wishing to exercise their rights in relation to any information we hold in accordance with applicable data protection laws.

If you wish to access, correct or update any personal information that we hold about you, then you should contact your HR representative or raise the matter via your line manager. You can also update certain types of information on People Systems via the Digital Workspace.

It is important to us that all of the information we hold about you is correct and up-to-date, so let us know promptly if there are any errors or other changes should be made.

Raising concerns about how we deal with personal information

If you are concerned about how we are dealing with your personal information, then you may have the right to complain to an applicable data protection authority. The relevant authority will depend on which country you are located in. For individuals located in Australia, the relevant authority is the Office of the Australian Information Commissioner, contact details below. Please contact dataprivacy@bhp.com for authorities in other locations.

Office of the Australian Information Commissioner

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Mail: GPO Box 5288, Sydney, NSW, 2001

Before raising a complaint with a data protection authority, we recommend that you first raise the issue with us so we can address your concerns as quickly as possible. We will make a record of your complaint and will deal with it as quickly as we can while keeping you informed of progress. Even if we are not able to address your concern, we will be able to provide further information about how you can contact a relevant data protection authority. For more information, please contact dataprivacy@bhp.com.

In addition, you may contact [EthicsPoint](https://ethics.bhp.com) (Phone: 1800 423 473) to obtain an impartial review of disputes regarding our compliance with the Notices or the handling of your personal information, or any other matters relating to information security and the Code of Business Conduct.

7. Country-specific rules

Additional privacy rules and restrictions relating to our management of your personal information may apply in some countries where we operate (including the United Kingdom).

United Kingdom

The additional provisions in this section apply to all individuals that work for BHP and are based in the UK.

Interpretation

For the purposes of all applicable UK and EU legislation, references in the Notices to 'personal information' shall be read as references to 'personal data' and BHP is the "controller" in relation to your personal information.

Legal bases for processing your personal information

BHP will only process your personal information where we have a legal basis for doing so. This means we will process your personal information:

- where necessary in connection with the entry into or performance of your contract of employment / engagement with us;
- to comply with our legal obligations as an employer;
- where it is in BHP's legitimate business interests, or its legitimate interests as an employer; or
- where you are given a genuine choice as to whether or not we collect your data and you have given us your consent. Where you have consented, you will always have the option to withdraw this consent at a later stage and you will never suffer any detriment if you choose not to consent.

India

The additional provisions in this section apply to all individuals that work for BHP and are based in India.

Grievance Officer contact information:

Victor Tsui
Head of Data Privacy & Data Ethics
BHP Group Limited
171 Collins Street
Melbourne VIC 3000
E: dataprivacy@bhp.com

8. Your Rights

In addition to the rights set out above, you have the right, in certain circumstances, to request:

- the erasure of any personal information that we hold about you;
- the restriction of processing of any personal information that we hold about you; and
- the transfer of your personal information from BHP to a third party.

You also have the right to object to the processing of your personal information by BHP in certain circumstances.

You can also request a copy of the documented safeguards that we have put in place relating to the sharing of personal information across national borders, including our group data transfer agreement,

If you wish to make a request, or raise an objection, of this nature, contact the BHP Data Privacy and Data Ethics Office at dataprivacy@bhp.com

9. Updates to the Notices

We will update the Notices from time to time where necessary to reflect changes in applicable laws or in our privacy compliance practices.

The latest version of the Notices will always be available on the Digital Workspace.

10. How you can contact us

If you have any questions about the Notices, contact our BHP Data Privacy and Data Ethics Office at dataprivacy@bhp.com

You can raise privacy-related queries (either related to the Notices or otherwise):

- with your direct supervisor at any time, who may either be able to respond themselves or may direct you to the BHP Data Privacy and Data Ethics Office for more detailed assistance; and/or
- directly with the BHP Data Privacy and Data Ethics Office at dataprivacy@bhp.com