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Adelaide Brighton's Privacy Commitment

This Privacy Standard applies to companies in the Adelaide Brighton Ltd Group of Companies ('**Adelaide Brighton**'), and outlines Adelaide Brighton's obligations in managing personal information about clients, employees, contractors and others. It also details the rights of individuals to access their personal information from Adelaide Brighton.

Adelaide Brighton is bound by the National Privacy Principles in the Commonwealth *Privacy Act 1988* ('**Privacy Act**'). Under the *Privacy Act*, '**personal information**' is generally any information (whether fact or opinion) and whether or not in a material form, from which an individual's identity is apparent or can reasonably be ascertained.

Collection of Personal Information

Adelaide Brighton only collects personal information about individuals to the extent necessary in connection with its business purposes. Those purposes include:

- to provide goods or services to individuals, or to respond to issues raised with Adelaide Brighton; and
- to allow Adelaide Brighton to conduct business transactions with individuals.

Personal information typically collected includes names, address, and contact details, information about transactions or dealings with Adelaide Brighton, and information about an individual's preference for the supply of goods and services by Adelaide Brighton. Certain shareholder and share registry information is also collected and held by or on behalf of Adelaide Brighton.

Personal information is usually collected directly from individuals (either by personal contact or by written correspondence), but information may also be collected by or from other parties. Where practicable, an individual's consent will be obtained for such a collection of personal information.

The *Corporations Act 2001* as well as Australian securities laws require the collection, retention and in some cases disclosure of individuals' personal information in certain circumstances.

Failure to provide Adelaide Brighton with all personal information requested by it may result in an inability to supply goods or services to the individual.

Individuals who provide Adelaide Brighton with personal information about another individual must ensure that the other individual is aware:

- that a disclosure of their personal information has been made;
- that they may request access to their personal information held by Adelaide Brighton; and
- how they may access that information from Adelaide Brighton (see **Point of Contact** below).

Adelaide Brighton does not actively collect sensitive information about individuals, but may occasionally hold sensitive information about job applicants. Sensitive information will not be disclosed without the individual's consent.

Use and Disclosure

Adelaide Brighton may use or disclose personal information for the primary purpose for which it was collected, or a reasonably expected secondary purpose that is related to the primary purpose, or with the individual's consent. Adelaide Brighton may also disclose personal information in the following circumstances:

The *Privacy Act* permits disclosure to Adelaide Brighton's related bodies corporate. Adelaide Brighton may use or disclose information to agents or contractors providing goods or services to, or acting on Adelaide Brighton's behalf (including its professional advisers), the identity of which may change from time to time.

Shareholders' personal information may be disclosed as required by Australian corporations and securities laws, and in connection with a bid to purchase Adelaide Brighton securities in proposed take-overs.

Information may be used or disclosed to keep individuals informed of Adelaide Brighton's activities, or goods or services from time to time. Individuals may notify Adelaide Brighton in writing at any time that they do not wish to receive this information (see **Point of Contact**).

Adelaide Brighton will not send an individual's personal information outside Australia without:

- consent; or
- otherwise complying with the *Privacy Act*,

and where such a transfer occurs, reasonable steps will be taken to ensure the recipients respect the confidentiality of the information by complying with the NPPs or an equivalent privacy-related law.

Data Quality, Storage and Security

Adelaide Brighton strives to ensure all personal information in its records is accurate, up-to-date and complete. Personal information is held in a combination of electronic, hard copy, photographic and video records stored securely at Adelaide Brighton's facilities (and sometimes at secure locations off-site). Storage procedures sometimes require records to be handled by contractors, and in these cases measures are taken to ensure security of records.

All personal information is stored securely, irrespective of its format. Hard copy information is stored in secure office facilities, and electronic information is protected by commercially standard security measures, which are regularly upgraded as part of Adelaide Brighton's extensive information technology systems.

Access to personal information is restricted to those personnel whose job functions require access. Some administrative functions may, from time to time, be contracted to service providers, and in these cases appropriate measures are implemented to ensure security and integrity of all information.

Access and Correction

An individual may request access to their personal information in Adelaide Brighton's records. All requests must be in writing to Adelaide Brighton's Privacy Officer (see **Point of Contact**).

Requests for access may be denied in some circumstances (in which case written reasons will be provided). These circumstances include;

- where, in Adelaide Brighton's opinion, the request is frivolous or vexatious;
- where providing access would have an unreasonable impact upon the privacy of others;
- where the information relates to existing or anticipated legal proceedings, or would prejudice Adelaide Brighton's commercial negotiations with the individual;
- where providing access would be unlawful, or where denying access is authorised by law.

Adelaide Brighton may charge an administrative fee for providing access to information (which will be advised when the request is made). Any personal information that is demonstrated to be inaccurate, incomplete or out-of-date will be corrected or, if necessary, deleted.

Other Privacy Information

Adelaide Brighton does not use any Government-generated identifier to identify any individuals.

In accordance with its business practices, email messages sent from or received via Adelaide Brighton's systems may be retained, including certain personal information including email addresses and text. Under the *Privacy Act*, Adelaide Brighton's standards relating to emails will, in some cases, constitute collections, uses and disclosures of personal information to which this Standard applies. Adelaide Brighton reserves the right to monitor all email messages entering or exiting its systems.

This Standard is current as at 21 December 2001. Adelaide Brighton may amend this Standard from time to time in accordance with future changes to its business practices, changes to the law or community expectations regarding privacy. A current version of the Policy will always be available from Adelaide Brighton's website at www.adbri.com.au, or from the Privacy Officer (see **Point of Contact**).

Point of Contact

To request access to personal information held in Adelaide Brighton's records, to request a copy of the Standard, to notify a preference not to receive future correspondence from Adelaide Brighton, or to enquire generally in relation to privacy matters, individuals should write to:

**The Privacy Officer
Adelaide Brighton Limited
Level 1, 157 Grenfell Street
ADELAIDE SA 5000**

**Telephone: +618 8223 8000
Facsimile: +618 8215 0030
Email: adelaidebrighton@adbri.com.au**

This policy applies to Adelaide Brighton Ltd and all its subsidiary companies.