

**LEGISLATIVE COUNCIL**  
**Question Without Notice**

**Tuesday, 8 August 2023**

**C825. The Hon. Nick Goiran to the Parliamentary Secretary representing the Minister for Mines and Petroleum**

The context to my question is a confidential email I've received from a concerned constituent following a phone call purportedly from the Perth Mint asking them to update their personal details, and I ask:

1. Does the Perth Mint make phone calls requesting current or former customers to update their personal details?
2. What data belonging to previous customers does the Perth Mint retain?
3. Does Perth Mint have a data privacy policy?
4. If yes to 3), will the Minister table a copy of this policy?

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**Answer**

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1. As part of its regulatory compliance, The Perth Mint does periodically contact current and former customers via telephone, e-mails and letters to request they update their personal details using a secure method. The Perth Mint does not request customers to update personal details over the phone.
2. As part of its regulatory compliance, The Perth Mint retains data to verify the identity of a customer, maintain the customer's account and record their transactions. The data is held per the defined retention periods in the relevant legislation.
3. The Perth Mint has a range of privacy policies, including a Privacy Policy regarding customers' personal data.
4. The Perth Mint's Privacy Policies are publicly available at the webpage:  
<https://www.perthmint.com/privacy-policy/>  
Copies of these policies are tabled with this answer.

*Bill Goiran*

# Privacy Policy

## Introduction

Gold Corporation (trading as The Perth Mint ABN 98 838 298 431) (**us, we, our**) is committed to protecting the privacy of your (**you, your**) Personal Information. This Privacy Policy has been developed in accordance with the *Commonwealth Privacy Act 1988* (**Privacy Act**), including the Australian Privacy Principles, and the *Privacy Amendment (Notification of Data Breaches) Act 2017*. Together, we refer to applicable pieces of legislation as “**Privacy Law**”.

This Privacy Policy applies to how we collect, hold, use and disclose Personal Information and provides information on how we deal with your Personal Information as customers, visitors to our website and in relation to the use of our products and/or services. Use of our website is conditional on your acceptance of the terms of this Privacy Policy.

We will comply with this Privacy Policy in respect of information provided to us by persons under the age of 18 years. Those persons must obtain the consent of a parent or guardian prior to using our website or one of our products or services and the parent or guardian will be responsible for appropriately supervising the person's use of our website or one of our products or services.

By using our website, products or services, or otherwise providing us with your information, you consent to the collection, storage, use and disclosure of your Personal Information in accordance with this Privacy Policy and as otherwise permitted under Privacy Law.

We may at any time vary the terms of this Privacy Policy to reflect changes, including to privacy legislation, technological changes, company policy and customer feedback. We will endeavour to notify you of any variation to this Privacy Policy, but you should check this Privacy Policy regularly so that you are aware of any variations made. You will be deemed to have consented to such variations by your continued use of our website or other products and services that are subject to this Privacy Policy following such changes being made.

## Scope

This Privacy Policy applies to all persons making use of our website or one of our products or services.

All current and past Gold Corporation employees, independent contractors, Board members, peers, agents, third party suppliers and contractors who provide services to Gold Corporation are bound by this Privacy Policy.

This Privacy Policy does not apply to the handling of personal information relating to prospective, current and past Gold Corporation employees, independent contractors, Board members, peers, agents, third party suppliers and contractors who provide services to Gold Corporation, to the extent the handling of this personal information is covered by Gold Corporation's [People and Culture Privacy Policy available at here](#)

Current site only: Please note that solely in relation to our mobile application GoldPass USA we have a separate Privacy Notice for United States Residents (GoldPass USA). For this information please refer to the [Privacy Notice for California Residents CCPA](#).

# Collecting Personal Information

We collect Personal Information that is reasonably necessary for us to conduct our business, including to provide products and services to our customers, to improve our products and services, and when customers access our sites, including the Perth Mint. We may also collect information to fulfil administrative functions associated with the provision of our services and products, for example entering into contracts with you or third parties, managing our relationship with customers, suppliers and employees, responding to requests for information and other general enquiries, processing customer transactions, as well as to maintain and grow our customer base and market our products and services. We also may need to collect personal information to meet certain contractual, legal or regulatory obligations. Sensitive Information may be collected where you have given express consent for us to do so and the information is reasonably necessary for us to provide our services, functions or activities, or where otherwise permitted under Privacy Law.

The types of Personal Information we collect and store depends on the nature of your interaction with us and may include the following:

- your name;
- current address;
- telephone number;
- email addresses;
- other forms of identification, i.e. driver's license, passport;
- your member login details to The Perth Mint website, i.e. log in credentials;
- purchase records;
- correspondence;
- financial and transactional information; and
- other information that you may provide.

If we are unable to collect Personal Information we reasonably require, we may not be able to provide you with our products or services. We may collect Personal Information directly from you in a number of ways, including, but not limited to, by email, over the telephone, through written correspondence, in person (i.e. when you make purchases at The Perth Mint shop), on-line by use of tracking software, through our website (i.e. subscriptions to our newsletter, member login and registration, and online purchase) and product and service offerings.

We may collect Personal Information from third parties in some instances. For example we may use third parties to analyse use of our website, which may involve the use of cookies (see below for further details).

## Storage and security

We hold Personal Information in several ways, including in electronic databases or files, emails, and in paper files held in secured drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities. Our policy is to take reasonable steps to:

- make sure that the Personal Information that we collect, use and disclose is accurate, up to date, complete (and in the case of use and disclosure) relevant; and
- protect the information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

The steps we take to secure the Personal Information we hold include security (such as encryption, firewalls, anti-virus software, login and password protection), secure office access, personnel security, and training and workplace policies.

If we no longer need your Personal Information, and unless required to be retained by law, we will take reasonable steps to destroy or de-identify your Personal Information. Notwithstanding the reasonable steps we will take to secure your Personal Information, there is a risk that breaches may occur. We have established procedures in place to investigate whether a data breach has occurred and if notification or other action is required under Privacy Law requirements.

If you reasonably believe that there has been unauthorised use or disclosure of your Personal Information, please contact our Privacy Officer.

## Websites, applications, IP addresses and cookies

Personal Information provided to our Online Shop is encoded using Transport Layer Security technology, a powerful encryption protocol that protects data as it travels over the Internet. Credit card transactions are processed using the secure EFTPOS network. Our policy is to ensure that all transactions processed by us meet industry security standards to ensure payment details are protected.

Like many companies, we use 'cookie' technology on our website. 'Cookies' are small text files stored on your computer that websites can use to improve the customer experience, for example by: recognising repeat users, storing registration data, and keeping and facilitating the user's online preferences and use of the websites. Gold Corporation uses the information generated by some cookies (i.e. Google Analytics and Google Tags) for marketing purposes.

Most internet browsers are set to accept cookies but can be adjusted to reject cookies or to notify you when they are being used. If you prefer that cookies not be used, you can choose to reject cookies from our Cookie Banner. Rejecting cookies can, however, limit the functionality of our websites (such as preventing members from logging on and making purchases). Our websites contain links to other webpages. We are not responsible for the privacy policy and contents of such webpages nor their policies regarding the collection, storage, use and disclosure of your Personal Information. We recommend you refer to the relevant webpages and encourage you to always read the applicable privacy statement or policy of the linked site.

Visitors to our website can request to join a mailing list by completing a form on this site. We maintain this list of Perth Mint Priority Members to inform them of new information on our websites. We do not sell, rent, lease, loan, trade or otherwise divulge the addresses on our lists to third parties or any unauthorised personnel. We comply with the Spam Act 2003 and best practice guidelines in relation to the contents of its commercial electronic messages.

If you are concerned about sending your information over the internet, you can contact us directly by the telephone or postal address below.

## Use and disclosure of information

We will use and/or disclose your Personal Information for the purpose it was collected. We may also use and/or disclose your personal information for other purposes which you consent to or which are required or permitted by law. This may include for a secondary purpose that is related to a purpose for which we collected it, and for which you would reasonably expect us to use or disclose your personal information. The Personal Information we collect is for purposes including determining how to process your requests and transactions, to provide you with high quality service, to tell you about products we think will be of interest to you, to customise your experience on our site, and to understand your needs so that we may provide you with the most suitable products. We may send this information via post, telephone or any form of electronic communication. We may also use any email address or other Personal Information you provide to us for this purpose.

To help us carry out these activities and functions, on occasion, we may disclose Personal Information to other persons including:

- organisations that we engage with to conduct business, research or analysis;
- our professional advisors (i.e. auditors and lawyers); and
- government and regulatory authorities (as required or authorised by law).

We take reasonable steps to ensure that any third parties we use are bound by privacy obligations in relation to your Personal and Sensitive Information. In the event of a security incident involving unauthorised access, use or disclosure of Personal Information involving a third party with whom we have shared Personal Information, we work cooperatively with them to protect the Personal Information that we have shared with them.

## Disclosure of personal information overseas

We may disclose your Personal Information to third party service providers who are located overseas. For example, information we collect may be held in a cloud-based server overseas. Unless you provide your consent or an exception under Privacy Law applies, we can only disclose your Personal Information to an overseas third party in certain circumstances, including if you provide your consent, we have taken reasonable steps to ensure that the overseas third party does not breach the Australian Privacy Principles or the overseas recipient is bound by a similarly stringent privacy protection regime.

## Use of information for marketing

From time to time, we may use the Personal Information we collect from you for direct marketing as allowed by Privacy Law. This marketing may be for purposes such as providing you with news, promotions and special offers, and other information which we think you may find interesting. At any time, you can opt out of receiving marketing material by using the unsubscribe capability in email communications or by contacting our Privacy Officer. After receiving such a request we will:

- cease sending you direct marketing;
- identify the source of any information used to contact you for direct marketing purposes, unless it is impracticable or unreasonable to do so; and
- perform these tasks within a reasonable period of time.

You agree and acknowledge that if you opt out of receiving marketing material, we will still send you essential information that we are legally required to send you relating to services we provide to you.

## Access, accuracy and correction - information

You have the right to request access to your Personal Information that we hold. You also have the right to request its correction if it is inaccurate, incomplete or out of date. We will take reasonable steps to give access to the information or correct it within a reasonable period of time from receipt of your request, subject to any exemptions allowed under the Privacy Law. For example, we will not provide you with access to the extent it would be illegal to do so or, unless required otherwise by law, your request is frivolous or vexatious or it would have an unreasonable effect on the privacy of others. If access is refused, we will give you a notice explaining our decision to the extent practicable and your options to make a complaint.

To request access to or correction of your Personal Information please contact our Privacy Officer. We will require you to verify your identity and to specify what information you require. If a fee is charged for providing access, you will be advised of the likely cost in advance.

## Notifiable data breaches

Gold Corporation subscribes to and has implemented clear procedures for the management and notification of data breaches in order to comply with the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (an amendment to the *Privacy Act*) effective 22 February 2018.

## Contact us and complaints

Please contact us if you have any queries about the Personal Information that we hold about you or the way we handle that Personal Information. You can complain to us about how we have collected or handled your Personal Information. We will investigate your complaint and we endeavour to respond within 30 days of receiving your complaint or within timeframes designated by Privacy Law.

Our contact details are below:

### THE PERTH MINT

Attention: The Privacy Officer

📍 Reply Paid 6297  
PO Box 6297  
East Perth WA 6892  
Australia

✉ [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

☎ [\(+61 8\) 9421 7632](tel:(+618)94217632)

Call Monday to Friday, 8.30am - 4pm (AWST)

📠 [\(61 8\) 9221 2258](tel:(618)92212258)

🌐 [perthmint.com](http://perthmint.com)

If you contact us and are not satisfied with our response you may refer your complaint to the [Office of the Australian Information Commissioner](#):

### OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER

📍 GPO Box 5218  
Sydney NSW 2001

✉ [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## Definitions

**Australian privacy principles** means the principles under the Privacy Act 1988 (Cth) by which relevant entities, including Gold Corporation, must collect, use and disclose Personal Information.

**Personal information** means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, (including you):

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

**Notifiable data breach** (refer Annexure) means a data breach that is likely to result in serious harm to any of the individuals to whom the information relates. It occurs when Personal Information held by Gold Corporation is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference.

**Sensitive information** includes, but is not limited to, information or an opinion about your racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preferences, criminal record, health information or genetic information.



# Privacy Notice for California residents CCPA

*Last updated on 24 March, 2022*

This **Privacy Notice for United States residents** supplements the information contained in Gold Corporation's Privacy Policy and applies solely to all visitors, users, and others who reside in the United States.

## Looking for the 'Do not sell or share my personal information' link?

The Perth Mint does not have an opt-out option for the sale or sharing of personal information. Based on our current understanding of the CCPA and current regulatory guidance, it is our belief that we do not "sell" or "share" your information (as defined in the CCPA) to any party. At any time, you can opt out of receiving direct marketing material by using our website's unsubscribe capability on the [Sign up for news form](#).

## Privacy Notice

We have adopted the *California Consumer Privacy Act of 2018 (CCPA)* as the privacy legislative standard to apply to the GoldPass USA mobile application in the United States for ease of application as a benchmark. Any terms defined in the CCPA have the same meaning when used in this notice. We acknowledge that there are differences in privacy laws between States in the United States and we will give effect to these State-specific legislative differences as required under applicable privacy and other laws, and if there are any conflicts between State-specific privacy laws, the applicable State-specific privacy law that is more protective of your personal information shall control to the extent of such conflict. If there are any conflicts between this Privacy Notice for United States Residents and any provision of the Gold Corporation Privacy Policy and you are a United States resident, the portion that is more protective of your personal information shall control to the extent of such conflict. If you have any questions about this Privacy Notice for United States Residents or whether any of the following rights apply to you, please contact us at:

### THE PERTH MINT

Attention: The Privacy Officer

📍 Reply Paid 6297  
PO Box 6297  
East Perth WA 6892  
Australia

✉ [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

☎ [\(+61 8\) 9421 7632](tel:(+618)94217632)

Call Monday to Friday, 8.30am - 4pm (AWST)

📠 [\(61 8\) 9221 2258](tel:(618)92212258)

🌐 [perthmint.com](http://perthmint.com)

# 1. Information we collect

Our website, application and services collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("**personal information**"). In particular, our website, application and services collect and have collected the following categories of personal information from its consumers within the last twelve (12) months:

## Categories of personal information

CATEGORY	EXAMPLES	CATEGORIES OF THIRD PARTIES WE SHARE PERSONAL INFORMATION WITH:
Identifiers, profile or contact data	A real name, postal address, billing address, unique personal identifier such as passwords, online identifier, internet protocol address, email address, account name, date of birth, social security number, driver's license number, passport number, or other similar identifiers	<ul style="list-style-type: none"><li>• Service providers</li><li>• Advertising partners</li><li>• Business partners</li><li>• Parties you authorise, access or authenticate</li></ul>
Personal information categories listed in the California Customer Records statute ( <i>Cal. Civ. Code § 1798.80(e)</i> )	A name, signature, social security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, bank account number, or any other financial information.	<ul style="list-style-type: none"><li>• Service providers</li><li>• Advertising partners</li><li>• Business partners</li><li>• Parties you authorise, access or authenticate</li></ul>

Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Advertising partners</li> <li>• Business partners</li> <li>• Parties you authorise, access or authenticate</li> </ul>
Device/IP data and internet or other similar network activity	IP address, device ID, type of device/operating system/browser used to access our services, browsing history, search history, referring webpage/source, non-identifiable request IDs, information and statistics on a consumer's interaction with a website, application, or advertisement.	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Advertising partners</li> <li>• Business partners</li> <li>• Parties you authorise, access or authenticate</li> </ul>
Geolocation data	IP-address-based location information	<ul style="list-style-type: none"> <li>• Service providers</li> <li>• Advertising partners</li> <li>• Business partners</li> <li>• Parties you authorise, access or authenticate</li> </ul>

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Personal information does not include:

- Publicly available information lawfully made available from government records.
- Deidentified or aggregated information.
- We may create aggregated, de-identified or anonymized data from the personal information we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve our services and promote our business, provided that we will not share such data in a manner that could identify you.

# Categories of sources of personal information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you
  - When you create an account or use our interactive tools and services.
  - When you voluntarily provide information in free-form text boxes through our services or through responses to surveys or questionnaires or other forms.
  - When you send us an email or otherwise contact us.
- Indirectly from you.
  - For example, from observing your actions on our website or GoldPass application, such as through the use of Cookies (defined in the *Tracking Tools, Advertising and Opt-Out* section below).
  - If you download our mobile GoldPass application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
- From third parties
  - Vendors: For example, we may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
  - Advertising Partners: We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, services, advertisements or communications.

## Personal information of children

We do not knowingly collect or solicit personal information about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use our website, services or GoldPass application or send us any personal information. If we learn we have collected personal information from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided personal information to us, please contact us on the below email.

PRIVACY OFFICER

✉ [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

## 2. Collection and use of personal information

We may collect and use the personal information for one or more of the following commercial or business purposes:

- Providing, customizing and improving our services, including our website and GoldPass application, including:
  - Creating and managing your account or other user profiles.
  - Processing your requests, purchases, transactions, and payments and preventing transactional fraud.
  - Providing you with the products, services or information you request.
  - Providing you with support and to respond to your inquiries, including investigating and addressing your concerns and monitoring and improving our responses.
  - Improving our services, including testing, research, internal analytics and product development.
  - Personalizing our services, website content and communications based on your preferences.
  - Doing fraud protection, security and debugging.
- To fulfill or meet the reason you provided the personal information. For example, if you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. If you share your name and contact information to request a price quote or ask a question about our services, we will use that personal information to respond to your inquiry. We may also save your information to facilitate new product orders or process returns or reversals.
- To market our services, including showing you advertisements, such as interest-based or online behavioral advertising.
- To correspond with you, including:
  - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Gold Corporation or our services.
  - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- To meet legal requirements and enforce legal terms, including:
  - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
  - Responding to law enforcement requests.
  - Protecting the rights, property or safety of you, Gold Corporation or another party.
  - Enforcing any agreements with you.
  - Responding to claims that any content violates third-party rights.
  - Resolving disputes.

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

## 3. Sharing personal information

We may disclose your personal information to the categories of service providers and other parties listed in this section.

- **Service Providers:** These parties help us provide our services or perform business functions on our behalf. They include:
  - Hosting, technology and communication providers.
  - Security and fraud prevention consultants.
  - Analytics providers.
  - Support and customer service vendors.
  - Banking networks.
- **Advertising Partners:** These parties help us market our services and provide you with other offers that may be of interest to you. They include:
  - Ad networks.
  - Data aggregators.
  - Marketing Providers.
- **Business Partners:** These partner with us in offering various services. They include:
  - Businesses that you have a relationship with.
  - Financial technology providers.
  - Companies that we partner with to offer joint promotional offers or opportunities.
- **Parties You Authorize, Access or Authenticate:**
  - Third parties you access through our services.
  - Other users

## Legal obligations

We may share any of your personal information that we collect with third parties in conjunction with any of the activities set forth under “To Meet Legal Requirements and Enforce Legal Terms” in the “Collection and Use of Personal Information” section above.

## Business transfers

We are wholly owned by the government of Western Australia, and it is unlikely that any of the following events will occur. But in the interest of transparency and disclosure to you, all of your personal information that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy, sale or transfer of some or all of our or our affiliates’ assets or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these unlikely events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

## Tracking tools, advertising and opt-out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data— usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own cookies on your device(s). Please note that because of our use of cookies, the Services do not support “do not track” requests sent from a browser at this time.

We use the following types of cookies:

- **Essential cookies:** Essential cookies are required for providing you with features or services that you have requested. For example, certain cookies enable you to log into secure areas of our Services. Disabling these cookies may make certain features and services unavailable.
- **Functional cookies:** Functional cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/analytical cookies:** Performance/analytical cookies allow us to understand how visitors use our services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our services and how long visitors are viewing pages on the services. Performance/analytical cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising.
- **Retargeting/advertising cookies:** Retargeting/advertising cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled “information about interest-based advertisements”.

You can decide whether or not to accept cookies through your internet browser's settings. Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new cookie in a variety of ways. You can also delete all cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what cookie settings are available to you, look in the “preferences” or “options” section of your browser's menu. To find out more information about cookies, including information about how to manage and delete cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Information about interest-based advertisements

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services.

These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including personal data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties.

Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Services.

Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

We comply with the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles for Online Behavioral Advertising. Through the DAA and Network Advertising Initiative (“NAI”), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of, and greater control over, ads that are customized based on a consumer's online behavior across different websites and properties.

To make choices about Interest-Based Ads from participating third parties, including to opt-out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA's or NAI's consumer opt-out pages, which are located at [www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/) or [www.aboutads.info/choices](http://www.aboutads.info/choices).

## 4. Your rights and choices

United States residents have specific rights regarding their personal information. This section describes your rights and explains how to exercise those rights.



# Access to personal information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (subject to the laws of the State you are resident in). Once we receive and confirm your Valid Request (see *Exercising Access and Deletion Rights*), we will disclose to you:

- The categories of personal information we've collected about you.
- The categories of sources for the personal information we've collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we've collected about you.
- If we have disclosed your personal information to any third parties for a business purpose over the past 12 months, we will identify the categories of personal information shared with each category of third-party recipient. If we have sold your personal information over the past 12 months, we will identify the categories of personal information sold to each category of third-party recipient.

## Deletion request rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions under the CCPA. Once we receive and confirm your verifiable consumer request (see *Exercising Access and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

For example, we may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Exercising access and deletion rights

To exercise the access and deletion rights described above, you or your Authorized Agent (defined below) must submit a Valid Request (defined below) to us by either calling, emailing or writing to us on the contact details below.

## THE PERTH MINT

Attention: The Privacy Officer

📍 Reply Paid 6297  
PO Box 6297  
East Perth WA 6892  
Australia

✉ [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

☎ [\(+618\) 9421 7632](tel:(+618)94217632)

Call Monday to Friday, 8.30am - 4pm (AWST)

📠 [\(618\) 9221 2258](tel:(618)92212258)

🌐 [perthmint.com](http://perthmint.com)

Only you, or a person you authorize to act on your behalf (an “Authorized Agent”), may make a Valid Request related to your personal information. To authorize an Authorized Agent, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf. You may also make a Valid Request on behalf of your minor child.

A “Valid Request” must:

- Provide sufficient information that allows us to verify you are the person about whom we've collected personal information; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We may not respond to requests that do not meet these criteria. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a Valid Request does not require you to create an account with us.

We will only use personal information provided in a Valid Request to verify the requestor's identity or authority to make the request and complete the request.

## Response timing and format

We endeavor to respond to a Valid Request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and request an extension period in writing of up to ninety (90) days. Note that the response time may differ depending on the State that you are resident in and its applicable laws.

We will deliver our written response by mail or electronically, at your option.

We do not charge a fee to process or respond to your Valid Request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## Personal information sales

Based on our current understanding of the CCPA and current regulatory guidance, it is our belief that we do not “sell” your personal information (as defined in the CCPA) to any party. If in the future, we anticipate selling your personal information to any party, we will provide you with any required opt-out and opt-in rights.

However, as described in the *Tracking Tools, Advertising and Opt-Out* section above, we have incorporated Cookies from certain third parties into our services and, like many companies online, we use services provided by Facebook and other advertising companies that track user activity to help deliver interest-based ads (as described in more detail in the *Information About Interest-Based Advertisements* section above). These Cookies allow those third parties to receive information about your activity on our services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our services or on other websites you visit. For more information on how you can control or opt out of these Cookies, please refer to the *Tracking Tools, Advertising and Opt-Out* section above.

## Non-discrimination

We will not discriminate against you for exercising any of your privacy rights. Unless permitted by the relevant privacy laws, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services.
- Provide you a lower level or quality of goods or services.

However, we may offer different tiers of our services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of personal information that we receive from you.

## 6. Other State law privacy rights

If you are a California resident, the information below also applies to you:

- California's "Shine the Light" law (Civil Code Section § 1798.83-1798.84): permits users of our website or services that are California residents to contact us to prevent disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email or write to us at:

## THE PERTH MINT

Attention: The Privacy Officer

📍 Reply Paid 6297  
PO Box 6297  
East Perth WA 6892  
Australia

✉ [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

☎ [\(+61 8\) 9421 7632](tel:(+618)94217632)

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📠 [\(61 8\) 9221 2258](tel:(618)92212258)

🌐 [perthmint.com](http://perthmint.com)

- Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time. To find out more about "Do Not Track," you can visit [allaboutdnt.com](http://allaboutdnt.com).

If you are a Nevada resident, the information below also applies to you:

- You have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us at the email below with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account.

## PRIVACY OFFICER

✉ [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

# 7. Changes to our Privacy Notice


We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on our website and update the notice's effective date. *Your continued use of our website following the posting of changes constitutes your acceptance of such changes.*

# Contact information

If you have any questions or comments about this notice, the ways in which we collect and use your information described in this notice, your choices and rights regarding such use, or wish to exercise your rights under California or other applicable State law, please do not hesitate to contact us at:

## THE PERTH MINT

Attention: The Privacy Officer

 Reply Paid 6297  
PO Box 6297  
East Perth WA 6892  
Australia

 [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

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# Know Your Customer Privacy Collection Notice

The Perth Mint is undertaking a broad customer due diligence refresh of its customer base to strengthen important risk management structures and ensure it meets its regulatory obligations under Australian federal law including under the *Anti-Money Laundering, Counter Terrorism Financing Act*.

The Perth Mint is collecting personal information on its customers to confirm the accuracy of current personal information it holds and collect and verify any additional personal information it requires to comply with its regulatory obligations so it can continue to provide its services to you.

The Perth Mint will be collecting the following personal information:

- your full name
- date of birth
- residential address
- occupation
- phone number, and
- email address.

The Perth Mint will also be collecting the following sensitive information:

- a yes/no responses as to whether you have any criminal convictions or criminal activities
- confirmation that you are a real person via a liveness check, and
- confirmation of your facial match conducted by comparing a photograph submitted by you with your photo ID.

The Perth Mint may also collect a copy of your photo ID, which may be your passport, driving license or National Identity Card.

The Perth Mint is utilising the services of its third-party identification and verification provider CREDAS, which is based in the United Kingdom. The Perth Mint may disclose your personal information and photo ID to CREDAS for the purposes of verifying your identification.

Alternatively, CREDAS may collect directly from you all of the personal and sensitive information already listed. The Perth Mint may collect all, or some, of your personal and sensitive information from CREDAS. CREDAS will hold a copy of your photo ID, and all personal information, for a maximum of 30 days.

The Perth Mint Privacy Policy sets out further information about how we will hold your personal information, how you can access, update and correct your personal information held by the Perth Mint. It also outlines how to lodge a complaint and how that complaint will be managed if you are concerned about how we handled your information. [The Privacy Policy is available at here.](#)

If you do not consent to the collection of your personal information under this Collection Notice, the Perth Mint will be unable to provide you with its services and may place your account on hold temporarily until we are able to verify your details.

# People and Culture Privacy Policy

## Introduction

Gold Corporation (trading as The Perth Mint ABN 98 838 298 431) (**us, we, our**) is committed to protecting the privacy of your (**you, your**) Personal Information. This People and Culture Privacy Policy (**Privacy Policy**) has been developed in accordance with the Commonwealth *Privacy Act 1988* (**Privacy Act**), including the Australian Privacy Principles, and the *Privacy Amendment (Notification of Data Breaches) Act 2017*. Together, we refer to applicable pieces of legislation as “**Privacy Law**”.

This Privacy Policy applies to how we collect, hold, use and disclose Personal Information and provides information on how we deal with your Personal Information as prospective, current or past employees.

We will comply with this Privacy Policy in respect of information provided to us by persons under the age of 18 years. Those persons must obtain the consent of a parent or guardian prior to provision of their information and the parent or guardian will be responsible for appropriately supervising the provision of any information.

By providing your Personal Information to us, you consent to the collection, storage, use and disclosure of your Personal Information in accordance with this Privacy Policy and as otherwise permitted under Privacy Law.

We may at any time vary the terms of this Privacy Policy to reflect changes to privacy legislation, technological changes, company policy and feedback. We will endeavour to notify you of any variations to this Privacy Policy, but you should check this Privacy Policy regularly so that you are aware of any variations made.

## Scope

This Privacy Policy applies to all prospective, current and past Gold Corporation employees, independent contractors, Board members, peers, agents, third party suppliers and contractors who provide services to Gold Corporation.

It does not apply to information classified as an Employee Record. Notwithstanding anything contained in this Privacy Policy, the handling of an employee record by Gold Corporation is exempt from the Australian Privacy Principles where it directly relates to a current or former employment relationship between you and Gold Corporation.

We endeavour to be transparent in the way we handle Personal Information. While we may be exempt from complying with the Australian Privacy Principles in relation to Employee Records, we will endeavour to handle the Personal Information of our employees in the same manner we would handle other Personal Information.



This Privacy Policy does not apply to the handling of Personal Information with respect to customers or visitors to our website and in relation to the use of our products or services. For this information, please refer to our main Privacy Policy at [www.perthmint.com/privacy-policy](http://www.perthmint.com/privacy-policy).

# Collecting Personal Information

We collect Personal Information that is reasonably necessary for us to conduct our business, including to properly manage our business affairs, the employment of staff, engagement with independent contractors, Board members, peers, agents, third party suppliers and contractors, and to comply with our legal and regulatory obligations. We will collect your Personal Information if you apply to be employed by or otherwise engaged to provide services to Gold Corporation. We collect Personal Information for the purposes of conducting background checks and considering suitability of prospective employees, entering into formalised agreements with employees and contractors, providing services and benefits to our employees and administering programs (including training

Sensitive Information may be collected where you have given express consent for us to do so and the information is reasonably necessary for us to provide our services, functions or activities, or where otherwise permitted under Privacy Law including, for example, where required or authorised under Australian law or for the establishment, exercise or defence of a legal claim.

The types of Personal Information we collect and store may include the following:

- your name;
- current address;
- telephone number;
- email addresses;
- other forms of identification, i.e. driver's license, passport;
- resume containing employment history and employment status;
- qualifications
- correspondence;
- health or medical information;
- psychometric or performance evaluations;
- your tax file number;
- financial information such as a bank account number and superannuation details;
- engagement, training, disciplining, performance, conduct, resignation or termination;
- terms and conditions of employment, including hours of work and salary or wages;

- personal details and emergency contact details;
- union membership or membership of a professional or trade association; and
- other information that you may provide.

If we are unable to collect Personal Information we reasonably require, we may not be able to assess an application you submit or proceed with formal engagement or employment.

We may collect your Personal Information in a number of ways:

- online application for a position;
- through our website;
- by email;
- written correspondence;
- in person;
- through third parties (recruitment agencies or referrals);
- via external providers of employment fitness for work assessments;
- via external providers of testing;
- via external agencies providing criminal record information;
- via external agencies confirming professional/trade qualifications or memberships;
- over the telephone (such as reference checks); and
- your online presence.

We may also collect, use, disclose and hold Personal Information that you provide to us about other individuals (e.g. name, contact details and email address of referees and emergency contact details). We rely on you to inform those individuals that their Personal Information is being provided to us and that they may contact us for further information.

## Storage and security

We hold Personal Information in several ways, including in electronic databases or files, emails, and in paper files held in secured drawers and cabinets. Paper files may also be archived in boxes and stored offsite in secure facilities. Our policy is to take reasonable steps to:

- make sure that the Personal Information that we collect, use and disclose is accurate, up to date, and complete (and in the case of use and disclosure) relevant; and

- protect the information that we hold from misuse, interference and loss and from unauthorised access, modification or disclosure.

The steps we take to secure the Personal Information we hold include security (such as encryption, firewalls, anti-virus software, login and password protection), secure office access, personnel security, and training and workplace policies.

If we no longer need your Personal Information, and unless required to be retained by law (including under the *Fair Work Act 2009* (Cth)), we will take reasonable steps to destroy or de-identify your Personal Information after twelve (12) months of receiving it.

The third-party providers that may be used to process your application, such as job board websites and recruitment agencies, may retain your personal information for a period longer than twelve (12) months and keep it available to us. In this event we will refrain from accessing any of your personal information submitted to or through such third parties. You may contact them directly and request your information to be removed.

If you wish to have your application maintained within our systems for future use beyond this twelve (12) month period you should let us know by emailing [HR@perthmint.com](mailto:HR@perthmint.com). Gold Corporation will keep any Employee Record it holds confidential to the maximum extent required by law.

Notwithstanding the reasonable steps we will take to secure your Personal Information, there is a risk that breaches may occur. We have established procedures in place to investigate whether a data breach has occurred and if notification or other action is required under Privacy Law requirements.

If you reasonably believe that there has been unauthorised use or disclosure of your Personal Information, please contact our Privacy Officer.

## Use and disclosure of information

The Personal Information we collect relates to your prospective or current engagement with Gold Corporation.

We will use and/or disclose your Personal Information for the purpose it was collected. We may use your Personal Information to provide you with information related to your prospective or current engagement with Gold Corporation, to verify your identity, process an application you submit and manage our relationship with you. We may send this information via post, telephone or any form of electronic communication. We may also use any email address or other Personal Information you provide to us for this purpose. We may also use and/or disclose your Personal Information for other purposes which you consent to or which are required or permitted by law. This may include for a secondary purpose that is related to a purpose for which we collected it, and for which you would reasonably expect us to use or disclose your personal information. For example, we may be required to disclose employee Personal Information to comply with our contractual obligations to government entities.

By registering a profile on our recruitment database, you are opting to receive email notifications of employment positions that we consider match the personal preferences you selected. You can tell us if you do not want to receive such information by emailing [HR@perthmint.com](mailto:HR@perthmint.com).

We collect Personal Information as part of our recruitment process, and may also collect Personal and Sensitive Information as a result of carrying out pre-employment screening checks, including:

- confirmation of education and/or previous employment details;
- reference checks;
- professional / trade association memberships;
- directorship;
- company checks;
- VEVO checks;
- CME (The Chamber of Minerals & Energy) clearances;
- psychometric testing; and
- employment assessment of fitness for work.

On occasion, we may disclose Personal Information to other persons including:

- organisations that we engage with to conduct business, research or analysis;
- organisations that we have contracted to provide services to you (i.e. superannuation, workers compensation, employee assistant program and salary continuance providers);
- organisations with which we have negotiated with on your behalf (i.e. corporate discounts for private medical insurance or health services, as part of the agreed terms of that negotiation);
- our professional advisors (i.e. auditors and lawyers); and
- government and regulatory authorities (as required or authorised by law).

We take reasonable steps to ensure that any third parties we use are bound by privacy obligations in relation to your Personal and Sensitive Information. In the event of a security incident involving unauthorised access, use or disclosure of Personal Information involving a third party with whom we have shared Personal Information, we will work cooperatively with them to protect the Personal Information that we have shared with them.

## Disclosure of personal information overseas

We may disclose your Personal Information to third party service providers who are located overseas. For example, information we collect may be held in a cloud-based server overseas. Unless you provide your consent or an exception under Privacy Law applies, we can only disclose your Personal Information to an overseas third party in certain circumstances, including if you provide your consent, we have taken reasonable steps to ensure that the overseas third party does not breach the Australian Privacy Principles or the overseas recipient is bound by a similarly stringent privacy protection regime.

## Access, accuracy and correction - information

You must ensure that the Personal Information held about you by the Gold Corporation is accurate. If your Personal Information changes you should amend the information or notify Gold Corporation as soon as possible to update it. If your Personal Information is inaccurate, incomplete or out of date and you request its correction, we will take reasonable steps to correct it within a reasonable period of time, subject to any exemptions allowed under the Privacy Law.

You have the right to request access to your Personal Information that we hold. We will take reasonable steps to give you access to the information within a reasonable period of time from receipt of your request, subject to any exemptions allowed under the Privacy Law. For example, we will not provide you with access to the extent it would be illegal to do so or, unless required otherwise by law, your request is frivolous or vexatious or it would have an unreasonable effect on the privacy of others. If access is refused, we will give you a notice explaining our decision to the extent practicable and your options to make a complaint.

To request access to or correction of your Personal Information please contact our Privacy Officer. We will require you to verify your identity and to specify what information you require. If a fee is charged for providing access, you will be advised of the likely cost in advance.

## Notifiable data breaches

Gold Corporation subscribes to and has implemented clear procedures for the management and notification of data breaches in order to comply with the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (an amendment to the *Privacy Act*) effective 22 February 2018.

## Contact us and complaints

Please contact us if you have any queries about the Personal Information that we hold about you or the way we handle that Personal Information.

You can complain to us about how we have collected or handled your Personal Information. We will investigate your complaint and we endeavour to respond within a reasonable period of receiving your complaint or within timeframes designated by Privacy Law.

Our contact details are below:

# THE PERTH MINT

Attention: The Privacy Officer

📍 Reply Paid 6297  
PO Box 6297  
East Perth WA 6892  
Australia

✉ [privacyofficer@perthmint.com](mailto:privacyofficer@perthmint.com)

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If you contact us and are not satisfied with our response you may refer your complaint to the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)):

## OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER

📍 GPO Box 5218  
Sydney NSW 2001

✉ [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

*Last updated August 2021*

## Definitions

**Australian Privacy Principles** means the principles under the Privacy Act 1988 (Cth) by which relevant entities, including Gold Corporation, must collect, use and disclose Personal Information.

**Employee Record** has the meaning given to that term in section 6 of the Privacy Act 1988 (Cth) and in relation to an employee, means a record of Personal Information relating to the employment of the employee. Examples of Personal Information relating to the employment of the employee are health information about the employee and Personal Information about all or any of the following:

- (a) the engagement, training, disciplining or resignation of the employee;
- (b) the termination of the employment of the employee;
- (c) the terms and conditions of employment of the employee;
- (d) the employee's personal and emergency contact details;
- (e) the employee's performance or conduct;

(f) the employee's hours of employment;

(g) the employee's salary or wages;

(h) the employee's membership of a professional or trade association;

(i) the employee's trade union membership;

(j) the employee's recreation, long service, sick, personal, maternity, paternity or other leave;

(k) the employee's taxation, banking or superannuation affairs.

**Notifiable Data Breach** (refer Annexure) means a data breach that is likely to result in serious harm to any of the individuals to whom the information relates. It occurs when Personal Information held by Gold Corporation is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference.

**Personal Information** means any information or an opinion about an identified individual, or an individual who is reasonably identifiable, (including you):

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

**Sensitive Information** includes, but is not limited to, information or an opinion about your racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, membership of a trade union, sexual preferences, criminal record, health information or genetic information.

*Last updated 27-4-22*