

1. Introduction

Protecting your privacy is very important to us. This policy sets 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 this policy, please contact the BHP Data Protection and Privacy Office at dataprivacy@bhp.com

What does this policy do?

This policy describes how BHP deals with personal information of individuals that interact with BHP – this includes representatives of our suppliers, customers, sponsors and business partners; landowners; industry association representatives; users of the BHP website and mobile applications (“**apps**”); shareholders; and job applicants.

For the purposes of this policy, “**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.

Who we are

References to “BHP”, “we” or “us” in this policy mean 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, #50-01 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 interactions with BHP. In some circumstances, we may also collect sensitive personal information about you.

How we collect personal information

We will primarily collect personal information from you either directly (such as when you subscribe to a news alert or request information from us, including through the [Contact Us](#) form available on our website) or indirectly from your interactions with us (such as by monitoring your use of the BHP website and apps). In some cases, we may also collect personal information about you from third parties (such as recruitment 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, job title, photograph and date of birth.

Contact details – such as your home and business address, email address and telephone number.

Recruitment-related information – such as your name, email address, location, telephone number, qualifications, employment history, interests, types of roles you are interested in, your work application form and resume or CV. If you progress through the interview process, we may also collect interview notes, references, results of any psychometric tests and background checks (including criminal records checks), your work visa and other information to verify your identity and right to work.

e-Business information – this includes information required to provide access to BHP e-Business websites or portals (such as login information, IP addresses), and records of your use of those websites or portals.

Usage information – information we collect when you use our websites or apps, such as server log information (your IP address, browser type, operating system, browser language, time zone, access times and any referring addresses) and location information.

Other information – this includes information about 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,

communications with you (including complaints or concerns raised by you or any feedback or survey responses that you provide to us) and other information you voluntarily provide to BHP.

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 collect sensitive personal information about you (such as health or medical information, criminal history checks, or your racial or ethnic origin), 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 our contractual relationships, recruitment, monitoring access to our websites and apps, managing safety and security risks, and complying with our 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 our relationship with you – this includes providing you with information or services, improving our products and services and communicating with you;
business-related purposes – this includes negotiating, managing, and fulfilling our contracts with customers, suppliers and third parties (including e-commerce transactions); managing business relationships; administering real estate leases and licences; conducting clearance procedures; managing accounts and records; supporting corporate social responsibility activities; resource planning and workforce management; activities and operations; internal investigations; and debt administration;
marketing and public relation purposes – this includes analysing the characteristics of visitors to our website; to prepare analytics and profiling for business intelligence purposes; to personalise your experience on our website; managing our newsletters and communications and, where BHP collects details in the membership database relevant to BHP’s e-Business website, for demographic analysis and personalisation of the website.

recruitment-related purposes – this includes considering you for career opportunities (including internship positions) with BHP and inviting you to participate in recruitment activities and events;

managing safety and security risks – this includes managing and monitoring access and use of our premises and sites, safety and security at our sites (including through the use of CCTV), and our IT environment (including monitoring electronic communications) and the health of those on our sites;

website administration and internal operations – this includes troubleshooting, data analysis, testing, research, statistical and survey purposes;

managing shareholder relationships – this includes for the purposes of undertaking share transactions, dividend payments and communications with shareholders; and

legal obligations – this includes meeting obligations imposed under law; 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.

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; or

where otherwise permitted by applicable laws and regulations.

Cookies

Our websites and apps may use cookies. Cookies are small pieces of data stored on the web browser of your device. These are used by us for site administration and analysis purposes and to deliver tailored content. If you wish not to take advantage of cookies, you may configure your browser not to accept them (although this may disable or render unusable some of the features our online services). For more information, please see our [Cookie Policy](#).

Hyperlinks

Our websites and apps may contain links to other websites. We are not responsible for the privacy practices or the content of other websites. The privacy practices applicable to other websites may differ substantially from ours. Please read the privacy policy of any other websites you visit before using such websites.

4. Who we share your personal information

with

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* this policy. 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 (see [here](#)). 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, information technology 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.

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 this policy.

Information security

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.

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

We generally store the personal information that we collect in electronic databases. These databases are generally hosted in our dedicated data centres in Australia (Perth), Chile (Santiago) and the USA (Dallas).

We may also use third parties to store and process your personal information. However, we will only do this if 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 this policy or as otherwise required by law.

Job applicants

If you are a job applicant, and your application is unsuccessful, we may retain your personal information for 12 months for the purposes of considering you for other roles within BHP. We are under no obligation to retain your personal information for this purpose and may elect to delete your personal information at any time following an unsuccessful application.

You may request that we delete your personal information from our database at any time. You can do this by managing your profile on our job vacancy website or by emailing us at jobs@bhp.com.

We will not deactivate your account on our job vacancy website, unless you request that we do so. You will be able to log-in to the website and apply for other roles.

If your account is inactive for 12 months, we will contact you to check whether you want it to remain live. If we do not hear from you, or if you ask us to do so, we will deactivate your account. Following deactivation, all of your account information will be destroyed or erased from our systems in accordance with our standard information retention and destruction policies.

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, please send a request to 'General Enquiries' on the [Contact us](#) form available on

our website.

If you are a job applicant, you can update your personal information via your profile on our job vacancy website. You may also remove any personal information you provided to us via BHP's job vacancy website at any time by sending a request to jobs@bhpbilliton.com.

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. A list can be found [here](#).

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 the BHP Data Protection and Privacy Office.

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 this notice 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 a contract between you and us;

to comply with our legal obligations;

where it is in BHP's legitimate business interests; 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.

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 Protection and Privacy Office](#).

8. Updates to this policy

We will update this policy from time to time where necessary to reflect changes in applicable laws or in our privacy compliance practices. The latest version of this policy will always be available online through the BHP website.

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9. How you can contact us

If you have any questions about this policy, contact our [Data Protection and Privacy Office](#).

You can raise privacy-related queries (either related to this policy or otherwise) with the [BHP Data Protection and Privacy Office](#).

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