

Policies and Procedures

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**External Privacy Policy**  
**Spark Infrastructure Group**

# Your privacy

## 1 About the Spark Infrastructure Group and this policy

We are a long-term investor in energy infrastructure assets. Our investment portfolio comprises regulated electricity transmission and distribution assets in New South Wales (TransGrid), Victoria (CitiPower and Powercor, together known as Victoria Power Networks) and South Australia (SA Power Networks).

We also develop, own and operate renewable energy generation assets and are focused on leading the renewable energy transition in Australia. Spark Renewables, a wholly owned subsidiary of Spark Infrastructure, also owns and operates Bomen Solar Farm in NSW and has an extensive development pipeline including the 2.5GW Diniwan Energy Hub.

As part of our operations, we engage with (amongst others):





- business contacts of the businesses we invest in and our clients;
- prospective and existing employees, contractors and our non-executive directors;
- past and current investors; and
- individuals that are interested in our energy infrastructure projects and assets.

This policy describes how we collect, use and disclose personal information in the operation of our businesses. In this policy, when we say:

- **we, our or us** – we mean each of the Spark Infrastructure Group entities listed in Schedule 1.
- **our operations** – we mean our investments into, operation of, and our products and any services in connection with, energy infrastructure assets.
- **you** – we mean you, the reader of this policy.
- **your information** – we mean your personal information, which we describe in section 3.
- **our partners** – we mean our third-party service providers and other organisations that we partner with in connection with our operations.
- **privacy laws** – we mean all privacy and data protection laws that apply to us when we handle your information, including the *Privacy Act 1988* (Cth) (**Privacy Act**).

## 2 We're here to help. Get in touch.

You can get in touch with us at any time about the way we handle and safeguard your information.

If you want to:	
	ask questions
	ask us to correct or update your information
	register a concern
	opt out of certain communications

	anything else...
<b>we're just a call or a few clicks away.</b>	

If you have any questions or complaints about how we handle your information, you can get in touch with our Privacy Officer by any of the following means:

<b>Email:</b>	<a href="mailto:privacy@sparkinfrastructure.com">privacy@sparkinfrastructure.com</a>
<b>Phone:</b>	+61 2 9086 3600
<b>Address:</b>	Privacy Officer Spark Infrastructure Group Level 40, Suite 40.03, Tower One International Towers Sydney 100 Barangaroo Avenue Barangaroo NSW 2000 Australia

You may also submit your complaint anonymously via the Spark Infrastructure Group whistleblower service:

<b>Website:</b>	<a href="https://sparkinfrastructure.stoplilereport.com/">https://sparkinfrastructure.stoplilereport.com/</a>
<b>Email:</b>	<a href="mailto:makeareport@stipline.com.au">makeareport@stipline.com.au</a>
<b>Phone:</b>	1300 30 45 50 (Australia)

### 3 What information do we collect?

We collect and hold personal information in operating our business, including contact information, financial information, and general information to enable us to conduct our operations, provide you with information about our investments and projects, for recruitment and other purposes.

We collect and hold the following types of personal information in operating our business.

Category	Details
Your contact details	This includes information about you that is necessary for us to contact you in relation to our operations or services (eg, your name, address or postcode, contact number and email address). For example, we may collect this information when you submit an enquiry form through our website or call us to make an enquiry or complaint.
Your information when you are acting in a business capacity	This includes your work contact details, position description and certain information about your preferences required for corporate entertainment (eg, dietary requirements). We may collect this information if you are an employee of our customer, contractor, service provider, investor or a business we invest in.
Service details	We may collect details about the services that we have provided to you, including any additional information necessary to deliver such services and respond to your enquiries.

Category	Details
Information collected for recruitment purposes	<p>When you apply for a job or position with us, we may collect certain information (including your name, contact details, working history, social media profile(s), CV/resume and relevant records checks) from you, any recruitment consultant, your previous employers, background check services providers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract.</p> <p>If you become our employee, we may collect further information from or about you in connection with your employment (eg, bank details for payments processing, performance appraisals and emergency contact information). We may also collect similar types of information about you if you are our non-executive director or temporary secondee.</p>
Information collected as part of our investing activities	<p>When we conduct our operations related to investment into energy infrastructure assets and businesses, we may collect your information if you are involved in that asset or business (eg, if you are an employee of the businesses in which we invest). This information may include your work contact details, details related to your remuneration, position in your company and any health and safety or other work-related incidents involving you.</p>
Past investor Information	<p>If you used to be an investor of the Spark Infrastructure Group when it was listed and provided your information to our share registry service provider - Boardroom, we may collect information about your past investment in our group, your past distributions and any enquiry you submit with Boardroom going forward.</p>
Community engagement	<p>If you are interested in our energy infrastructure projects (eg, if you live in a community that is in close proximity to our project), we may collect your contact details to provide you with development updates. We may also collect your opinions about our projects and take photographs of our community engagements for inclusion in reports and for social media updates.</p>
Additional information you provide	<p>This includes information you provide to us directly through our website or social media platforms (eg, LinkedIn or Instagram) or indirectly through your use of our website or online presence or through other websites or sources from which you permit us to collect information.</p>
Information collected by cookies	<p>We may collect de-identified information via cookies on our website, such as your browser type, operating systems and other websites visited. There are more details about cookies in section 9.</p>

We may also collect other categories of information about you.

## 4 How do we collect your information?

We collect your personal information when you engage with us or from third parties.

In many instances, we collect personal information directly from you. Here are some of the main ways.

Category	Details
Website enquiries	<p>When you submit an enquiry form through our website, you might provide your contact details.</p>

Category	Details
Communication	Where you communicate with us through telephone correspondence, email, or when you share information with us on, or contact us through, social media platforms or websites, such as LinkedIn and Instagram.
Interaction	When you visit our premises or interact with our sites, content, recruitment team, participate in our community engagement programs or use our services.
Investment	When you invest in our business.

We may also collect information about you from third party service providers and other organisations that we partner with. For example, when you apply for a job or position with us, we may collect information about you from any recruitment consultant, your previous employers, referees, CV checking agencies or others who may be able to provide information to assist us with our decision.

## 5 For what purposes do we use your information?

We use your personal information to enable us to carry out and improve our operations and services.

We may collect, hold, use and disclose your personal information for the following purposes:

Category	Details
Website access	To contact you in relation to the enquiry forms you submit through our website.
Contact	To contact you when we need to tell you something important about our operations, premises or your information.
Community engagement	To keep you updated about our energy infrastructure projects that you expressed interest in or which we consider to be relevant to you. Please contact us using the details in section 2 if you do not want to receive these updates.
Past security holder's requests	To assist with responding to your queries regarding your past investments into our businesses.
Recruitment	To consider your employment application.
Employment	To process your entitlement payments, evaluate employee engagement and in relation to our engagement of HR consultant services.
Security	To maintain security of our premises, sites, operations, data and infrastructure (including to verify your identity).
Sales and acquisitions	To facilitate actual or prospective divestments, acquisitions, investments, sales or other changes to the Spark Infrastructure Group.
Service Providers	In the course of receiving services from our service providers.
Law	To comply with laws and assist government or law enforcement agencies where we are required, authorised or permitted to do so.
Other purposes when de-identified and/or aggregated	We may de-identify and/or aggregate your personal information. When we do this, we may use that de-identified information for other purposes that may not be set out in this policy. We may also share this de-identified information with our stakeholders such as the Department of Planning and Environment or our investors.

## 6 Do we store or share your information outside of Australia?

We may store and disclose your personal information overseas.

We may disclose personal information outside of Australia where our third party service providers store information overseas or to our investors or directors located overseas, including Singapore, the United Kingdom and the European Union. Your personal information may also be disclosed overseas where our service providers that have access to your personal information use cloud service providers that store information overseas.

## 7 Who do we share your information with?

We may share your personal information with our partners and for other reasons we tell you about in this policy or on our website.

We may share your personal information with:

- our employees and directors;
- our investors;
- third party suppliers and service providers (including providers for the operation of our websites, our business or in connection with providing our services to you);
- professional advisers, dealers and agents;
- our existing or potential agents, business partners or partners;
- anyone to whom our assets or businesses (or any part of them) are, or may be, transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, to comply with laws in any of the jurisdictions in which we operate, or as otherwise required, authorised or permitted by law.

## 8 Using our website

We use cookies on our website to track your website usage and remember your preferences.

Our website includes pages that use cookies which are small files that store information on your computer, mobile phone or other device. We may use them to recognise you across devices and browsing sessions.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. If you refuse the use of cookies in this way you may not be able to access the full functionality of our website. Please refer to your internet browser's instructions or help screens to learn more about these functions.

We may also use third party analytics tools, such as Google Analytics, to help us gather and analyse this information.

## 9 How do we protect your information?

We take a number of measures to keep your information safe.

We generally hold personal information in our secure electronic servers but may also store personal information in hard copy form and in various third-party platforms.

Our website and our working environment are built with integrated processes designed to safeguard your information and protect it from misuse, interference loss and unauthorised access, modification or disclosure.

Here are some of the key things we do to protect your information.

Category	Details
Staff training	We put our staff through training about how to keep your information safe and secure.
Secure storage and handling	We implement access controls and engage third parties to operate our IT systems and to provide security services in respect of our IT systems to protect your information.

## 10 What are your rights in relation to your information?

You have rights in relation to your personal information. You can contact us to exercise any of your rights in relation to your information.

Here are the things you can ask us to do in relation to your information at any time:

Category	Details
Access	You can request a copy of your information.
Correct	You can ask us to correct or update your information.
Complain	You can express your concerns or complaints to us about your privacy in the context of our operations or the way we are handling your information. We take your concerns seriously and will seek to fix any problem as soon as possible.

When you contact us in relation to a request for access, correction or to make a complaint, please use the contact information in section 2 and include your name and contact details (such as email address and phone number) and clearly describe your request or complaint. We will contact you promptly to let you know we have received your correspondence. We will formally respond to your complaint within 30 days.

Where we are unable to fulfil your request to access or correct your personal information for a legal or other reason, we will let you know why. We may also need to verify your identity when you request your personal information.

If you are not happy with the way we handle your query or handle your information (including our response to your request to access or correct your personal information), you have a right to

lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**) by visiting the OAIC [website](#).

## 11 Employees

We are bound by the Australian Privacy Principles contained in the Privacy Act. However, those principles do not apply to certain records and practices relating to the employment relationship between us and our current and former employees in Australia. As such, most of the information contained in this Privacy Policy does not apply to how we use and disclose information relating to our current and former employees.

If you are our current or former employee, we may collect personal information from you as part of our employment relationship. This information may include:

Category	Details
Your general personal information	This includes information or an opinion about you that is reasonably identifiable. For example: your name, address, age or date of birth, contact number, email address and image.
Educational and social information	This includes details of your education, references from your institutions of study, and information relating to your interests and extra-curricular activities. It also includes lifestyle information and social circumstances.
Sensitive information	This includes information concerning your health and medical conditions, certain criminal convictions and offences, racial or ethnic origin, religious or philosophical beliefs, sexual orientation, trade union membership.
Financial information	This includes your bank account number, tax file number and tax status (including residence status), and credit checks (where required).
Work related information	This includes details of your work history, any opinions you express through employee engagement surveys, professional activities and interests, involvement with and membership of industry bodies and professional associations and any personal information captured in the work product(s) you create while employed by us.

If you are a current or former employee and you have any questions in relation to our handling of your personal information, please contact our Privacy Officer using the contact information in section 2.

## 12 Changes to this policy

If we need to change this policy in a way that affects the way we handle your information, we will publish the changes to this policy on our website. We encourage you to check our website periodically to ensure that you are aware of our current policy.

## 13 Find out more

You can find out more about the various privacy laws and other rules, regulations and standards we have mentioned in this policy by visiting the website of the Office of the Australian Information Commissioner.



**OAIC**

OAIC home <https://www.oaic.gov.au/>



**Effective:** 1 June 2023

## Spark Infrastructure Group entities

- Pika BidCo Pty Ltd (ABN 67 652 787 258)
- Pika HoldCo Pty Ltd (ABN 56 652 787 150);
- Spark Infrastructure Trust (ABN 30 664 665 564);
- Spark Infrastructure Holdings No. 1 Limited (ABN 14 116 940 786);
- Spark Infrastructure (Victoria) Pty Limited (ABN 18 116 940 740);
- Spark Renewables Pty Limited (ABN 90 632 860 023);
- Bomen SF HoldCo Pty Ltd (ACN 631 229 331);
- Bomen SF Hold Trust (ABN 23 832 721 903);
- Bomen Solar Farm Pty Ltd (ABN 40 620 832 108);
- Bomen SF Trust (ABN 67 363 258 504);
- Bomen SF FinCo Pty Ltd (ABN 46 631 229 359);
- Dinawan Energy Hub Pty Ltd (ABN 83 646 054 524);
- Dinawan Energy Hub Trust (ABN 86 873 457 480);
- Mates Gully Solar Farm Pty Limited (ABN 72 640 967 755);
- Malle Wind Pty Ltd (ABN 12 636 566 713);
- Wattle Creek Energy Hub Pty Ltd (ABN 28 664 148 958);
- Wattle Creek Energy Hub Trust (ABN 88 172 296 913);
- Renewables ServiceCo Pty Limited (ABN 96 667 788 669);
- Yorke Peninsula Wind Farm Project Pty Ltd (ABN 15 138 965 901);
- Spark Infrastructure Holdings No. 2 Limited (ABN 16 116 940 795);
- Spark Infrastructure (SA) Pty Limited (ABN 80 116 940 688);
- Spark Infrastructure SA (No1) Pty Limited (ABN 54 091 142 380);
- Spark Infrastructure SA (No2) Pty Limited (ABN 19 091 143 038);
- Spark Infrastructure SA (No3) Pty Limited (ABN 50 091 142 362);
- Spark Infrastructure Holdings No. 3 Limited (ABN 62 117 034 492);
- Spark Infrastructure Holdings No. 5 Pty Limited (ABN 23 151 150 275);
- Spark Infrastructure Holdings No. 4 Pty Limited (ABN 66 116 823 548);
- Spark Infrastructure RE Limited (ABN 36 114 940 984);
- Spark Infrastructure Electricity Assets Pty Ltd (ACN 609 164 570);
- Spark Infrastructure Electricity Assets Trust (ABN 95 674 223 769);
- Spark Infrastructure Electricity Operations Pty Ltd (ACN 609 164 598); and
- Spark Infrastructure Electricity Operations Trust (ABN 48 311 370 213).