



PRIVACY POLICY

Last Revision: February 2014
www.iconenergy.com

The Icon Energy Group Policy on Privacy

1.0 POLICY PURPOSE

In the course of business there will be circumstances where Icon Energy collects personal information and the objective of this policy is to ensure that this information is handled appropriately. The policy sets out broad controls when the Company has regarding the collection, maintenance, storage and use of personal information as required under the *Privacy Act 1988*.

2.0 POLICY STATEMENT

Icon Energy respects the privacy of personal information and will take reasonable steps to keep it strictly confidential. Icon Energy is committed to maintaining a structured and secure records management system which contains “Personal Information”. “Personal information” is information if an opinion regarding a person, where the identity of the person is apparent or can be reasonably ascertained from the information or opinion.

Access to internal files is segregated into areas for departmental management and confidential information is restricted within these areas.

For the general purpose of this policy a record includes a soft copy or hardcopy of:

- A document
- A database
- A photograph or pictorial representation of a person

But does not generally include:

- A generally available publication
- Anything kept in a library, art gallery or museum for the purposes of reference, study or exhibition

3.0 PRIVACY POLICY APPROACH

Icon Energy will maintain the following approach to ensure the privacy of records by ensuring that:

- Personal information shall not be collected for inclusion in a record, or in a generally available publication, unless the information is collected for a lawful purpose related to the functions of the Company and the collection is necessary to the function of Icon Energy;
- Icon Energy shall only collect personal information, where it is necessary to do so and it will only be collected with the consent of the person to whom it relates when the collection is required by law;
- Information provided by employees shall be maintained under the Icon Energy records management system. Records containing personal information are shredded as part of disposal. Electronic data is protected through password controlled systems. Access to personal information is restricted to authorised Company personnel;
- Personal information retained on employees includes the information recorded on employment forms, medical examinations and testing etc, training records and other Company documentation;
- Employees may request a copy of their personal records in writing, provision of which must be approved by the Managing Director.

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- Icon Energy will grant a person access to their personal information subject to the circumstances of the request;
 - A request to access personal information will be rejected if:
 - a) the request is frivolous or vexatious
 - b) providing access would have an unreasonable impact on the privacy of another person;
 - c) providing access would pose a serious and imminent threat to the life or health of any person;
 - d) providing access would prejudice Icon's legal rights;
 - e) there are other legal grounds to deny the request.
 - Where reasonable and practicable, Icon Energy will collect personal information directly from the person and inform them that this is being done;
 - Icon Energy will not alter personal information provided by employees unless provided with employee authorisation to do so, and the information provided by individuals shall be considered valid until the Company is notified otherwise;
 - Personal information will not be used for purposes other than for which it was collected; and
 - If required under the law, your personal information may be passed onto a relevant Government Department.

4.0 RESPONSIBILITIES

4.1 Managing Director and Key Management Personnel

The Managing Director, in conjunction with Key Management Personnel is required to implement and manage Icon Energy's records management system to ensure personnel privacy is maintained.

4.2 Information Communications Technology and Facilities Manager

The full-time Information Communications Technology and Facilities Manager is required to implement, maintain and ensure that the record management system is effective, secure and adequately protected. Any system updates or additional resources must be proactively sourced and recommended by the Information Communications Technology and Facilities Manager for approval by the Managing Director.

5.0 RELATED POLICIES & PROCEDURES

Refer to Icon Energy Limited's:

- Code of Conduct & Ethics



Ray James

Managing Director

Approved April 2014

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