

Alcoa's Australian Entities - Privacy Policy

This Privacy Policy sets out how the following entities ("Alcoa" or "we") will manage the personal information we collect.

Alcoa of Australia Limited ACN 004 879 298
Alcoa Portland Aluminium Pty Ltd ACN 006 306 752

What kind of personal information does Alcoa collect, use and hold?

In the ordinary course of our business, we collect personal information (such as names and contact details) reasonably necessary for or directly related to Alcoa's business operations, as detailed below.

Employees and Applicants

1. Personal information about Alcoa's employees to the extent necessary to establish and manage the employment relationship, including such functions as personnel administration, communications, recruiting, compensation and benefits administration, performance management, training, career development, mentoring, succession planning, business and workforce planning, information systems and data security management, site security, insurance, health and safety systems and procedures (including drug and alcohol policies), environmental compliance, management of employee travel, procurement and corporate credit cards, monitoring compliance with computer use policies, operation of an ethics reporting system, investigations concerning possible breaches of law or company policy, compliance with tax laws and labour laws or union agreements, legal claims and required government reports.
2. Emergency contact details for our employees so that we can contact someone close to the affected person in the event of an emergency.
3. Personal information about prospective employees and job applicants including their contact details, identification evidence, employment history and educational qualifications in order to assess whether that person is suitable for employment.

Suppliers and Suppliers' Personnel

4. Personal information about Alcoa's suppliers' personnel to the extent necessary for the following: inter-business communications, managing contractual obligations and performance; managing site access, communications, training, information systems management and data security, health and safety systems and procedures (including drug and alcohol policies), monitoring compliance with computer use policies, operation of an ethics reporting system, investigations concerning possible breaches of law or company policy, legal claims and required government reports.

Community

5. Contact details from individuals attending Alcoa forums and events and from individuals who email or telephone us on an unsolicited basis so we can respond to those individuals and keep them informed of operational activities or future community events. In some cases, Alcoa may hold photographs of individuals who attend events organised by Alcoa. Alcoa takes reasonable steps to obtain the consent of individuals prior to taking their photographs at these events.
6. Contact details from individuals who request tours of Alcoa facilities in order for us to coordinate and organise the tours.

Anti-Corruption

7. Contact details from individuals who contact us through our Integrity Line (where that information is volunteered by that individual) so we can investigate and respond to complaints and concerns.
8. Personal information about the employees of third party distributors, to ensure those distributors comply with laws concerning anti-corruption.
9. Business contact details and public information about government officials for the purpose of complying with anti-bribery and corruption legislation.
10. Personal information about family members of our employees including their employment, where consent has been obtained, to ensure we comply with our legal obligations in respect to fraud, insider trading and anti-corruption and any other legal requirements.

Other

11. Personal information about individuals through surveillance devices and speed cameras at our locations to protect our workforce, the public, or Alcoa against injury, abuse, fraud, theft.
12. Personal information about prospective tenants, purchasers and sellers of real estate necessary to engage with those individuals in relation to the leasing, sale or purchase of land, including where relevant, their contact details, identification evidence, tenant history and references in order to assess whether that person is suitable for a tenancy.
13. Some personal information from individuals through our website. Our web servers do not collect e-mail addresses unless individuals provide it to us. Alcoa does collect the domain name from which the connection originates. This information is used in the aggregate to measure pages viewed, the amount of time spent on the site and the number of visits. Alcoa uses this information to improve the content of its websites.

We also collect the following sensitive information.

14. Medical records about employees and contractors and others so we can administer health services to those persons. Alcoa does not use or disclose medical records for any other purposes (such as personal injuries or workers' compensation claims) unless it obtains an individual's specific consent;
15. Occupational hygiene records at the request of the Department of Mines and Petroleum (Mines Safety Branch) for health and safety purposes or as required by State and Commonwealth laws.

Frequently asked questions**What is 'personal information'?**

'Personal information' is defined as any 'information or an opinion about an identified individual, or an individual who is reasonably identifiable:

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

Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details, employment details and commentary or opinion about a person. What constitutes personal information will vary, depending on whether an individual can be identified or is reasonably identifiable in the particular circumstances.

How does Alcoa collect, use and hold personal information?

In most cases an individual is the best source of information about himself or herself, therefore, to the extent practical and appropriate, Alcoa collects personal information directly from the individual.

In those cases in which it is necessary to collect personal information from other parties, Alcoa only uses sources that the company believes to be reputable and takes measures to ensure that the privacy interests of individuals are respected. Examples of when Alcoa may seek information from others are set out above under "What kind of personal information does Alcoa collect, use and hold?"

Alcoa uses personal information collected from you for the purposes set out above under "What kind of personal information does Alcoa collect, use and hold?" In some cases Alcoa will disclose personal information about you to other Australian entities which perform functions related to the purposes for which the information is collected. For example, if you are an Alcoa manager, your personal information may be provided to Alcoa's bank in order for it to provide you with a corporate credit card.

Some of the personal information Alcoa holds will be kept in paper files, while other personal information will be included in computerised files and databases.

Alcoa takes reasonable precautions, including administrative, technical, policy, personnel and physical measures to safeguard your personal information against loss, misuse, theft and unauthorized access, disclosure, alteration and destruction.

How can you access personal information about you that is held by Alcoa and seek the correction of that information?

You have a right to request access to your personal information and to request its correction, except where specific legal exceptions exist. To do so, please call Alcoa's Integrity Line 1-800-00-2806, or lodge an enquiry via the internet site www.AlcoaEthicsandCompliance.com

or write to:

Alcoa Ethics and Compliance Organization
201 Isabella Street
Pittsburgh, P 15212
United States of America

Or email to:

EthicsandCompliance@alcoa.com

Do I have to provide my personal information?

By providing us with your personal information you accept that we will use that information for the purposes set out above, where applicable. You do not have to provide your information (and can contact us if you do not consent to us using your personal information for the purposes set out above), but failure to do so may mean that we are unable to provide you with goods or services, permit access to our operations or engage with you.

In some instances, Alcoa may collect personal information about you, without your knowledge, through the lawful use of surveillance devices and speed cameras at our locations. This information is collected for the purpose of protecting our workforce, the public, or Alcoa against injury, abuse, fraud and theft.

How can you complain about a breach of the Australian Privacy Principles and how will Alcoa deal with such a complaint?

If you would like to make a complaint about something you believe breaches the Australian Privacy Principles, please contact Alcoa's Integrity Line 1-800-00-2806, or lodge an enquiry or complaint via our internet site www.AlcoaEthicsandCompliance.com. If we receive a complaint from you we will respond within a reasonable period of time. If you receive our response and are not satisfied with the outcome, please contact the Office of the Australian Information Commissioner using the details set out on the following website: <http://www.oaic.gov.au/about-us/contact-us-page>

Is Alcoa likely to disclose personal information to overseas recipients? If so, what are the countries in which such recipients are likely to be located?

As part of our global business, it is likely that on occasion some information concerning you may be processed for the purposes mentioned above by Alcoa Inc. or, where reasonably necessary, its subsidiary companies as well as authorised third party application service providers. The location of Alcoa Inc's subsidiary companies can be obtained from its website www.alcoa.com or the Alcoa annual 10K Report lodged with the US Securities and Exchange Commission (<http://www.sec.gov/>). Alcoa's third party application service providers are carefully selected, designed, and accepted to ensure the Data is protected in accordance with applicable laws. The countries in which those recipients are likely to be located include: United States of America, India, Romania and Philippines.

If you have computer access to Alcoa's computer systems and an Alcoa domain email address, that email address and any information entered by you into Alcoa's Global Address Book is accessible by Alcoa's global employee and contractor workforce.

Changes to this policy

From time to time Alcoa may make changes to this privacy policy to reflect changes in its business. You should review this statement periodically to inform yourself of any changes. Please note the date of the statement below, so that you know when it was last updated. Users are bound by the then-current version of this privacy statement.

October 2016