

NORTHROP GRUMMAN | AUSTRALIAN PRIVACY POLICY

1 Introduction

This Privacy Policy:

- applies to Northrop Grumman Australia Pty Ltd ABN 78 156 458 981, Northrop Grumman M5 Network Security Pty Ltd ABN 58 101 674 444, Northrop Grumman Integrated Defence Services Pty Ltd ABN 53 090 673 466 and our other related bodies corporate based or carrying on business in Australia, or collecting or holding personal information in Australia (**Northrop Grumman** or **we, us or our**);
- explains how Northrop Grumman collects, holds, uses and discloses Personal Information (defined below) that is regulated by the Australian *Privacy Act 1988 (Cth)* (**Privacy Act**) and complies with the requirements of this Act and the Australian Privacy Principles (**APPs**) contained therein;
- applies in respect of all Personal Information collected by Northrop Grumman, including the Personal Information of our customers and suppliers, *other than* the Personal Information of past and current employees; and
- should be read in conjunction with:
- the Northrop Grumman Online Privacy Notice (**Online Notice**) that applies to the collection of personal information via the website accessible at northropgrumman.com and other external Northrop Grumman websites that link to the Online Notice, which is available at [Privacy Notice](#); and
- the Northrop Grumman Whistleblower Policy (**Whistleblower Policy**) that applies to reports submitted about matters that occurred in or relate to Australia and covered by Australian whistleblower laws, which is available at [Whistleblower](#).

Northrop Grumman is committed to meeting its obligations under the Privacy Act as it relates to private sector organisations. Accordingly, this policy describes the management of Personal Information and Sensitive Information collected by Northrop Grumman.

We may update this Privacy Policy from time to time. The most current version will be posted on the Northrop Grumman Australia website and will be effective from the date of posting. It is your responsibility to check our website from time to time in order to determine whether there have been any changes.

2 The kind of Personal Information we collect

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not (**Personal Information**).

Sensitive information is a particular type of Personal Information which may include, but is not limited to, information or an opinion about an individual's membership of a professional or trade association or membership of a trade union, information about an individual's criminal record, or health or medical information (**Sensitive Information**).

The types of Personal Information we collect about you depends on the circumstances in which that information is collected. The kinds of Personal Information we collect and hold may include:

- for **users** of our website, contact information (e.g. name, postal address, telephone number and email address), login credentials and data associated with your use of the website;
- for our **customers**, and **customers of third parties** who have engaged us to provide products and/or services in respect of those customers;

- the customer's contact information (e.g. name, postal address, telephone number and email address);
 - addresses of the site or premises where Northrop Grumman is supplying or delivering products and/or services;
 - billing information; and
 - other information relevant to the provision of products and/or services by or on behalf of Northrop Grumman to the customer's premises;
- for our **suppliers** and **service providers**, names and contact details of individuals working for or engaged by those suppliers and service providers, who we deal with; and
 - for **individuals** seeking employment with Northrop Grumman, contact information, curriculum vitae, current employment information (e.g. title, division, employer and military rank), security clearance information, and other information about your suitability for employment with Northrop Grumman; and
 - for **other individuals**, name, contact details and any other information relevant to our interactions with you.

3 How we collect Personal Information

3.1 Personal Information generally

Northrop Grumman collects Personal Information about you where it is reasonably necessary for us to perform one or more of our business functions or activities.

All Personal Information collected by Northrop Grumman will be collected by lawful and fair means, and not in an unreasonably intrusive way.

Northrop Grumman will generally collect your Personal Information from you directly. Northrop Grumman collects Personal Information about you when you use Northrop Grumman's website, make an enquiry with Northrop Grumman or enter into a contractual relationship with us in the course of doing business. There are however, circumstances in which we collect Personal Information from third party individuals, business entities and governmental agencies, such as courts, public agencies, law enforcement agencies, credit bureaus and service providers, regardless of whether such individual, business entity or governmental agency compiled the information itself or received it from other sources.

Where we collect Personal Information from a third party, we will handle that information in accordance with this Privacy Policy and any obligations we have to that third party.

Northrop Grumman may collect Personal Information about prospective employees, by conducting reference and background checks in relation to their application for employment with Northrop Grumman from time to time, including searches for any criminal records, employment and education verifications, personal credit history based on reports from any credit bureau and searches of any public records.

3.2 Sensitive Information

Northrop Grumman will only collect Sensitive Information about you where you have provided your consent to the collection of that information, or where we are required or authorised by law to do so. In providing any consents to the collection or handling of Personal Information (including Sensitive Information), you consent to us collecting, holding, using and disclosing the information you provide in accordance with the terms of those consents and this Privacy Policy.

3.3 If your Personal Information is not provided

If you do not provide us with your Personal Information when requested, this may limit the assistance we are able to provide to you, including assistance we are contracted to provide on

behalf of a third party. For example, we may not be able to provide the product and/or service you may have requested and may not be able to handle enquiries in connection with those products and/or services, or process your job application.

4 How we use and disclose Personal Information

4.1 General purposes

Northrop Grumman collects, holds, uses and discloses Personal Information about individuals for a variety of business purposes.

These include, without limitation, to:

- monitor and evaluate the performance and security of our website(s);
- facilitate the provision of our products and/or services to our customers and customers of third parties who have engaged us;
- facilitate the provision of such other products and/or services that Northrop Grumman may offer from time to time and provide information about their availability, features and benefits;
- work with and procure goods and/or services from our suppliers and service providers;
- facilitate recruitment and selection of prospective employees;
- facilitate conferences and other training and education programs;
- conduct audit, accounting, financial and economic analysis of our business operations;
- respond to enquiries or provide information you may have requested;
- investigate, report on and resolve complaints (including whistleblower reports, in which case your personal information will be handled in accordance with applicable whistleblower laws and our Whistleblower Policy);
- conduct surveys and otherwise seek customer feedback;
- protect our legal rights, investigate suspected misconduct or assist law enforcement agencies; and
- comply with our legal and regulatory obligations.

Northrop Grumman may also use and disclose Personal Information we collect for other purposes that are permitted, required or authorised by applicable law (including other permitted purposes under the Privacy Act), such as:

- purposes which you would reasonably expect and which are related (and, in the case of Sensitive Information, directly related) to the primary purpose of collection of Personal Information;
- other purposes for which you have given your consent; and
- in other permitted general and health situations under the Privacy Act, such as where we reasonably believe the collection is necessary to lessen or prevent a serious threat to an individual's life, health or safety or public health or safety, or to take appropriate action in relation to suspected unlawful activity or serious misconduct.

4.2 Marketing

Northrop Grumman will only use or disclose your Personal Information for the purposes of direct marketing (e.g. to communicate with you about products and/or services Northrop Grumman may offer from time to time) where we have your consent or we are otherwise permitted by law to do so.

You are free to opt out from receiving marketing communications from us at any time, by:

- following the “opt out” process indicated in a marketing communication you have received;
- contacting us using the contact details at the end of this Privacy Policy; or
- following such other process that is made available for this purpose from time to time.

4.3 Disclosure of Personal Information

In order to perform activities in connection with the purposes described in this Privacy Policy, Northrop Grumman may make Personal Information available to other persons or entities, or disclose it to them, including:

- our suppliers and service providers, including those to whom we outsource certain of our information technology functions (e.g. cloud service providers) and other data processing and reporting functions (e.g. online reporting portal service providers for whistleblower reports). We authorise our suppliers and service providers to use or disclose your Personal Information only as necessary to provide Northrop Grumman with supplies or perform services on our behalf, and/or to comply with legal requirements. We require suppliers and service providers by contract to safeguard the privacy and security of Personal Information they process on our behalf;
- any corporate purchaser or prospect to the extent permitted by law as part of any merger, acquisition, sale of Northrop Grumman assets, or transition of service to another provider, as well as in the event of insolvency, bankruptcy, or receivership in which Personal Information would be transferred as an asset of Northrop Grumman;
- other related bodies corporate of Northrop Grumman;
- government, regulatory, judicial or law enforcement authorities;
- accountants, insurers, auditors, lawyers and our professional advisers;
- any other third parties notified to you at or around the time we collect your Personal Information,

(together, the **Required Recipients**).

Although most Required Recipients are located within Australia, others may be located, or have relevant operations, overseas. In particular, Northrop Grumman may disclose Personal Information to our related body corporates and service providers in global locations where we conduct business, including the United States and the United Kingdom.

Therefore, it may be necessary to disclose or transfer your Personal Information abroad to overseas recipients. In these circumstances, Northrop Grumman will take reasonable steps to ensure that any overseas recipients of your Personal Information comply with the APPs under the Privacy Act.

5 How we hold Personal Information

Northrop Grumman holds Personal Information both electronically and in paper form.

We maintain administrative, technical and physical safeguards designed to protect Personal Information from misuse and loss, and unauthorised access, modification and disclosure.

Unless the law requires otherwise, we take reasonable steps to destroy or permanently de-identify Personal Information once it is no longer required for the business purposes articulated in this Privacy Policy or notified to you at or around the time of collection.

You should be aware that no data transmission over the internet can be guaranteed as totally secure. Although Northrop Grumman takes all reasonable steps to protect such data from

unauthorised access or disclosure, we do not warrant the security of any Personal Information and data that you transmit to us over the internet. You do so at your own risk.

6 Access to and Correction of Personal Information

You may request access to, and/or correction of, Personal Information that Northrop Grumman holds about you at any time. Such requests should be made in writing using the contact details at the end of this Privacy Policy. We will consider all requests to access and correct Personal Information within a reasonable time. Unless there are reasons why we cannot provide you with access to your Personal Information (e.g. for legal reasons), the Personal Information we hold about you will be made available to you and/or corrected within a reasonable time after we receive your request.

There is no charge for requesting access to your Personal Information, however Northrop Grumman reserves the right to charge reasonable costs for providing access to that Personal Information.

7 Keeping Personal Information current and accurate

Northrop Grumman takes reasonable steps to periodically review its information collection and storage practices to ensure that Personal Information we hold is accurate, up-to-date and complete. However, you should ensure that the Personal Information provided to us is accurate, complete and up-to-date at the time it is provided and you should promptly notify us of any changes to or errors in your Personal Information. To notify us of changes to or errors in Personal Information that we hold about you, please contact us in writing using the contact details at the end of this Privacy Policy and we will amend our records as appropriate.

8 Enquiries and complaints

If you wish to make an enquiry or complaint to Northrop Grumman regarding privacy matters, you should contact Northrop Grumman in writing using the contact details at the end of this Privacy Policy. We will endeavour to respond to your enquiry or complaint within 30 days.

If we fail to respond to a complaint within a reasonable time or if you are dissatisfied with our response, you can discuss your concerns with an independent adviser or refer the complaint to mediation or an external dispute resolution scheme. Finally, if your complaint has still not been resolved through one of those methods, you can take your complaint to the [Office of the Australian Information Commissioner](#).

9 Contact us

You may contact Northrop Grumman in relation to privacy matters by contacting our Australian Legal Director / Privacy Officer, either by:

- sending an email to the following address: Privacy@ngc.com;
- writing to:

Northrop Grumman Australia Pty Ltd

Attention: Northrop Grumman Australian Legal Director / Privacy Officer
Unit 3, 2 Faulding Street Symonston ACT 2609