

# **Privacy Policy**

## **New Zealand**





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#### **Privacy Policy**

Peninsula Group NZ Limited (Peninsula) collects and handles personal information in accordance with the Privacy Act 1993 (the Act), including the Information Privacy Principles. Personal information includes information relating to you and your employees.

If you are an employee of a client, please refer to the section headed 'Employee Information' below.

#### Collection of Information

The type of information Peninsula collects will depend on the nature of your dealings with Peninsula. Peninsula will generally collect personal information about you when you:

- instruct Peninsula to provide advice
- visit the website
- subscribe to a newsletter or to receive Peninsula publications
- apply for employment with Peninsula
- attend an Peninsula seminar
- engage in business dealings with Peninsula

If you are a client or a subscriber to Peninsula's mailing lists or online services, the personal information that will ordinarily be collected about you will include your name, business address, email address and contact numbers.

#### Information collected via this website

When you visit Peninsula's website, a record of your visit is made which records the following information:

- your top level domain name
- the date and time of your visit
- the web pages you accessed
- the documents you downloaded
- the type of browser you are using, your server address and IP address, on a general and aggregate basis, in order to analyse the performance of the site.

This data is used completely anonymously, in order to determine the amount of people who visit Peninsula's site and the most frequently used sections of the site. This enables Peninsula to continually update and refine the site. If you use any forms on the website to send an email to someone at Peninsula, a record will also be made of your email address.

The Peninsula website may contain links to other sites and Peninsula is not responsible for the privacy practices or policies of those sites.

## Collection of information in the ordinary course of business

Peninsula may also collect information about you in the course of its business, including your name, address, contact details and occupation. This information may be collected through meetings, face to face interviews, business cards, seminars, telephone calls and from third parties.

To provide you with advice, Peninsula may collect other personal information about you and your employees.



#### Sensitive information

Peninsula will only collect sensitive information about you (eg information about your membership with a professional body) with your consent, or if the collection is required or authorised or otherwise permitted under New Zealand law.

This information gained by Peninsula may be used to collect, hold, use and disclose the information for the purpose of:

- compiling statistical data and to maintain its database
- developing/improving its website
- responding to any email inquiries
- notifying you of any upcoming marketing, training or other events
- providing you with publications
- managing quality control
- upholding systems administration
- compliance purposes
- providing you or your organisation with advice
- receiving services from you or your employer
- employment purposes or to consider suitability of employment
- other marketing purposes

Peninsula will not use or disclose your personal information for any other purpose which is not related (or in the case of sensitive information, directly related) to the above purposes without your consent, unless otherwise authorised, required or permitted under New Zealand legislation.

If you no longer wish to receive information about Peninsula's services, please send an email to Peninsula's Privacy Officer (compliance.risk@peninsula-au.com) advising that you do not wish to receive further information.

#### Disclosure

Peninsula may disclose your personal information in the following ways:

- on a confidential basis to external service providers so that they can provide services such as financial or administrative services in connection with the operation of its business
- to any person (where necessary) in connection with its services, such as to regulatory authorities, partners or advisors
- to related entities of Peninsula

Some examples of services provided by external service providers include photocopying, archiving services, research organisations and consultants who conduct research on behalf of Peninsula so it can better meet the needs of clients and staff.

If Peninsula engages external service providers, it will take reasonable steps to ensure those entities comply with their obligations under the Act when they handle your personal information. Peninsula will also ensure external service providers are only authorised to use personal information for the limited purposes specified in Peninsula's agreement with them.

Peninsula will also take reasonable steps to ensure that any overseas related entities comply with the Act.



#### **Employee information**

Peninsula may collect the following personal information about an employee from their employer (Peninsula's client):

- name and address
- date of birth
- job title
- contact details, for example, details of next of kin
- ethnic origin and immigration status details, ie passport number/visa number and expiry dates
- company vehicle details
- IRD number
- terms and conditions of employment, including employee benefits
- information relating to employment (ie absence records, development records, annual and other leave entitlements, and disciplinary and grievance matters)

This information may include sensitive information (including information relating to an employee's health). Peninsula will only collect and use sensitive information about an employee, if the employee has consented to the collection, storage, use and disclosure of their personal information in accordance with this policy.

Any information about employees will be collected and stored on behalf of Peninsulas and clients. Clients will collect, store, use and disclose this information for the purpose of staff administration and management, equal opportunities monitoring and other employment related matters. Peninsula staff may also use this information to advise a client in relation to these purposes. An employee's personal information will only be used for purposes related to (or in the case of sensitive information, directly related to) their employment relationship, as otherwise authorised, required or permitted under New Zealand legislation or for another purpose to which the employee consents.

Peninsula will not disclose any employee's personal information to overseas recipients except as outlined in this policy. Peninsula will not disclose personal information to third parties without consent from the individual employee concerned, unless such disclosure is to a government body, regulator, law enforcement agency or other party required, authorised or permitted under New Zealand legislation. Employees may access their personal information, requests amendments to their information and make a complaint in accordance with this Privacy Policy.

## Access and amendment requests

If you wish to obtain access to any personal information we have collected about you, please, make a request in writing to Peninsula's Privacy Officer (compliance.risk@peninsula-au.com). A reasonable fee may apply for the provision of this information (ordinarily, an electronic print out or photocopy). Identification may be requested for security.

Peninsula will take reasonable steps to make sure any personal information it collects, uses or discloses is accurate, complete and up-to-date. If you believe that any information held by Peninsula is inaccurate, incomplete, out of date, irrelevant or misleading, please contact Peninsula's Privacy Officer.

Requests for access and amendments will be responded to within a reasonable period in accordance with the Act (Section 33, and principles 6-7). Clients will be notified if a request is received from their employees. Peninsula may refuse a request for access or amendment to personal information in the circumstances outlined in the Act. If access is refused, Peninsula will provide a written reason for the refusal.



#### **Complaints**

If you believe that there has been a breach of the Act, you should make a complaint in writing to Peninsula's Privacy Officer. Peninsula will respond to the complaint and confirm if further information or evidence is required. Peninsula will then investigate the issue and advise you in writing of the outcome of the investigation and any steps taken to resolve your complaint. If you are not satisfied with the outcome, Peninsula will advise you of further options including, if appropriate, review by the Privacy Commissioner within the The Office of the New Zealand Privacy Commissioner.

#### Security and retention of records

Peninsula will take reasonable steps to ensure that personal information is kept secure and protected against unauthorised access, modification or disclosure and from misuse, interference and loss.

Any data stored will be kept securely in New Zealand. Only certain authorised employees of a client or Peninsula, who are required to have access to the personal information for the purposes of their job role, will be able to access the information.

This website uses Session Cookies only during a search query of the website. Upon closing your browser, the Session Cookie is destroyed and no personal information is maintained which might identify you if you were to visit our website at a later date.

Although system security is very important to Peninsula, no data transmission over the internet is 100% secure. Peninsula cannot accept responsibility for the security of information you send to or receive from Peninsula over the internet.

Peninsula will take all reasonable steps to destroy personal information if it is no longer required.

#### How to contact Peninsula

Please review the website regularly as this statement as it may change from time to time. The privacy policy will be made available to anyone who requests it, whether at Peninsula's offices or on its website.

**Privacy Officer** 

Phone: **0800 675 700** 

Level 3, 8 Tangihua Street, Auckland CBD, 1010

Email: compliance.risk@peninsula-au.com





