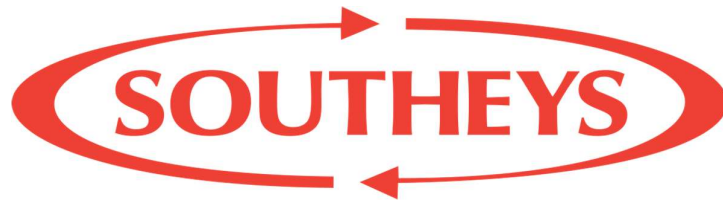


# Client Privacy Policy for Southeys Group Ltd

## Contents

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## Purpose

We know that how we collect, use, disclose and protect your information is important to you, and we value your trust. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

The purpose of this Privacy Policy is to inform our clients and any users of our digital platforms (i.e. our website, social media pages, and online learning platform ) about how we comply with the requirements of the New Zealand Privacy Act 2020 ("the Privacy Act") in managing personal information.

## Consent to Privacy Policy

Please note that when you contact us through our website, or social media pages, you are agreeing to this Privacy Policy. If you do not agree with this Privacy Policy, please do not contact us through any of our digital platforms, but call us on +64 9 411 8339. If you do not agree with this Privacy Policy, but have viewed this Privacy Policy through our website, your online device information may have already been collected. This information will be treated in accordance with this Privacy Policy.

## Collection of personal information

Personal Information is defined in the Privacy Act as information about an identifiable individual (a natural person as opposed to a company or other legal entity).

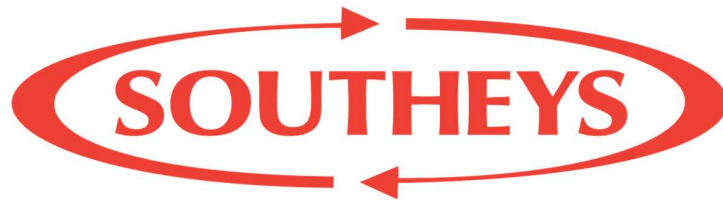
### **Types of personal information we collect**

The types of personal information we collect will vary depending on the nature of your dealings with us. We only collect personal information that is necessary. Where reasonable and practicable, we will collect your personal information directly from you and inform you that we are collecting it.

We mainly collect personal information directly from you, for example:

- Over the telephone or a video call (such as over Microsoft Teams, Zoom or Skype) e.g. when you talk to our staff;
- Through one of our digital platforms like our website, Facebook and LinkedIn pages (including through any online chat).
- When you email or write to us; or

If it is not obvious that we are collecting personal information from you, we will do our best to make it clear to you so that you are always aware when information is being collected.



Generally, the types of personal information we collect and hold include your:

- Name;
- Contact details (such as your email address, postal address, phone number);
- Details relating to your use of any product and/or service offered by us;
- Details of your enquiry;
- Details of any preferences you tell us about (such as preferences);
- Credit references responses

We collect your personal information from the above parties (other than publicly available sources and Shopify) where we have received your express consent to do so. We are not responsible for the privacy or security practices of the above parties and the parties described above are not covered by this Privacy Policy.

#### **Online device information – cookies**

If you are visiting us through our website or social media pages or engaging with marketing communications that we send you, then we collect information about your use and experience on these by using cookies.

Read our [Cookie Statement](#) and understand what cookies are, why we use them, and how to change your cookie settings.

When you interact with us through our website, social media pages or engage with marketing communications, the information collected through the cookies may include:

- The date and time of visits;
- Website page (or pages) viewed;
- The website from which you accessed the internet and our website or other digital platform;
- How you navigate through the website and interact with pages (including any fields completed in forms and applications completed (where applicable));



- Information about your location;
- Information about the device used to visit our digital platform; and
- IP address (or addresses), and the type of web browser used.

We will not ask you to supply personal information publicly over Facebook, LinkedIn, or any other social media platform that we use. Sometimes we may invite you to send your details to us through a private message, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions, but we would require your express consent prior to us including you in such activities.

## Purpose of collection and use of personal information

Any personal information you provide to us may be used to:

- Check whether you are eligible for the product or services offered by us;
- Facilitate those services;
- Provide information that you request; and / or
- Provide you with further information about our other products and services.

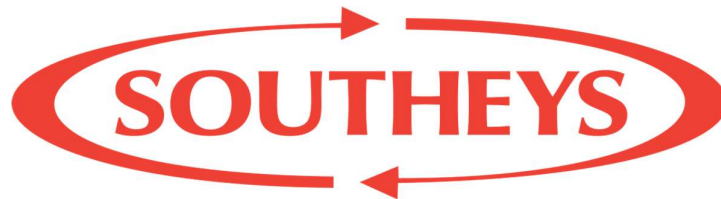
We also have an obligation to maintain personal information to disclose to regulatory and similar bodies - see [“Disclosure of your personal information”](#) below. These bodies have a legal right to such information.

## Storage and protection of your personal information

We may electronically record and store personal information which we collect from you. When we do so, we will take all reasonable steps to keep it secure and prevent unauthorised disclosure.

However, we cannot promise that your personal information will not be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur. If we provide you with any passwords or other security devices (e.g. for your subscription), it is important that you keep these confidential and do not allow them to be used by any other person. You should notify us immediately if the security of your password or security device is breached, this will help prevent the unauthorised disclosure of your personal information.

Some information we hold about you will be stored in paper files, but most of your information will be stored electronically on physical hard drives and on the cloud, by cloud service providers – see [“Cloud-based service providers”](#) below.



We use a range of physical and electronic security measures to protect the security of the personal information we hold, including:

- Access to information systems is controlled through identity and access management;
- Our buildings are secured with a combination of locks, monitored alarms and cameras to prevent unauthorised access;
- Employees are bound by internal information security policies and are required to keep information secure;
- We regularly monitor and review our compliance (and our service providers' compliance) with internal policies and industry best practice.
- We only keep information for as long as we need it, or as long as the law requires us to. We have a records management policy that governs how we manage our information and records to make sure we destroy any information that is outdated, irrelevant or unnecessary.

#### **Cloud-based service providers**

We use third party service providers to store and process most of the information we collect. We use Microsoft Azure. We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

#### **Timeframes for keeping personal information**

We take reasonable steps to destroy or permanently de-identify any personal information as soon as practicable after the date at which it has no legal or regulatory purpose, or we have no legitimate business purpose with it. We have a records management policy that governs how we manage our information and records to enable us to destroy any information that is outdated, irrelevant or no longer necessary.

#### **Sharing Information**

When you share your personal, company or client documentation (i.e. passports, client files, CDD identification and verification documents) with us to enable us to complete the scope of work assigned, we retain this information for different periods of time depending on the work involved and we have systems and processes in place to ensure that all documentation is safely stored and destroyed. Please contact us if you require more information on how long we retain your information. You can do so by contacting us at:

Via email at [info@Southeys.co.nz](mailto:info@Southeys.co.nz)

If you provide us with access to your file sharing service (i.e. Dropbox, Sharepoint etc) that contains your personal, company or client information, then you must take all reasonable steps to keep it secure and prevent unauthorised disclosure. It is your responsibility to remove our access after the time period that meets your business or personal requirements.

**If there is a privacy breach**

We work hard to keep your personal information safe. However, despite applying strict security measures and following industry standards to protect your personal information, there is still a possibility that our security could be breached. If we experience a privacy breach, where there is a loss or unauthorised access or disclosure of your personal information that is likely to cause you serious harm, we will, as soon as we become aware of the breach:

- Seek to quickly identify and secure the breach to prevent any further breaches and reduce the harm caused;
- Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals;
- Advise and involve the appropriate authorities where criminal activity is suspected;
- Where appropriate, notify any individuals who are affected by the breach (where possible, directly);
- Where appropriate, put a notice on our website advising our clients of the breach; and
- Notify the Privacy Commissioner.

## Disclosure of your personal information

We may disclose your personal information to others outside Southeys Group where:



- It is necessary to enable us to achieve the purpose that we collected the information for;
- We are required or authorised by law or where we have a public duty to do so;
- You have expressly consented to the disclosure or your consent can be reasonably inferred from the circumstances; or
- We are permitted to disclose the information under the Privacy Act 2020.

#### **Parties we may disclose your information to**

Your personal information may be used by us for the purpose of providing advice and services to you and may also be used by agencies such as, but not limited to:

- Any out-sourced service provider who assists in the services we are required to carry out waste disposal companies
- Our external dispute resolution service;
- The regulator or supervisor;
- Credit reporting and debt collecting organisations;

If we don't need to share your information with a third party in order to provide advice and services to you, we will not pass on your information to them without your consent. Under no circumstances will we sell or receive payment for disclosing your personal information.

#### **Third party websites**

Through our website or our other social media pages, you may be able to link to other websites which are not under our control. We are not responsible for the privacy or security practices of those third-party websites and the sites are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies and we encourage you to read them.

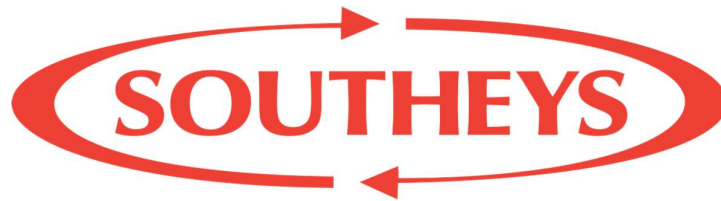
In addition, we have no knowledge of (or control over) the nature, content, and availability of those websites. We do not sponsor, recommend, or endorse anything contained on these linked websites. We do not accept any liability of any description for any loss suffered by you by relying on anything contained or not contained on these linked websites.

## **Right to access, correct and delete personal information**

You have the right to request access to, correct and, in some circumstances, delete your personal information. You can do so by contacting us at:

Or via email at [info@southeysgroup.com](mailto:info@southeysgroup.com)

When you contact us with such a request, we will take steps to update or delete your personal information, provide you with access to your personal information and/or otherwise address your query within a reasonable period after we receive your request. To protect the security of your



personal information, you may be required to provide identification before we update or provide you with access to your personal information.

We are only able to delete your personal information to the extent that it is not required to be held by us to satisfy any legal, regulatory, or similar requirements.

There is no fee for requesting that your personal information is corrected or deleted or for us to make corrections or deletions. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

If you are not satisfied with our response to any privacy related concern you may lodge a complaint on the Privacy Office website ([www.privacy.org.nz](http://www.privacy.org.nz)) or send a complaint form to the Privacy Commissioner at:

Office of the Privacy Commissioner

P O Box 10-094

Wellington 6143, New Zealand

Fax: 04- 474 7595

Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)

Telephone: 0800 803 909

Website: [www.privacy.org.nz](http://www.privacy.org.nz)