



## Privacy Policy



**conneXu**

Your life. **Your way.**

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## Purpose

To ensure ConneXu meets legislative and contractual requirements for the privacy of employees, services, and service users.

## Objectives:

That ConneXu adheres to the Privacy Act 2020 and its amendments, and the Health Information Privacy Code 2020.

## Scope:

This policy is applicable to all permanent, fixed term or contractual team members of ConneXu.

### 1. Introduction

- 1.1. This is the privacy policy (**Privacy Policy**) for ConneXu. In this Privacy Policy, ConneXu is also referred to as “we” and “us”. When we refer to “**Personal Information**” throughout this Privacy Policy, we mean personal information as defined in the Privacy Act 2020 (**Privacy Act**), being any information about an identifiable individual.
- 1.2. ConneXu is committed to protecting Personal Information and privacy rights generally. Please read this Privacy Policy and find out how to contact us if you have concerns about the use of your Personal Information.
- 1.3. This Privacy Policy applies to all of your information held by ConneXu, whether provided by you or collected from you or another source in accordance with this Privacy Policy.
- 1.4. This Privacy Policy sets out how we will collect, use, disclose, and protect Personal Information. It also covers how we make the Personal Information that we hold available to you for access and/or correction by you.
- 1.5. When dealing with Personal Information, ConneXu will comply with this Privacy Policy and with the Privacy Act.
- 1.6. We may collect Personal Information from overseas individuals (i.e. individuals who are not present in New Zealand). We store this Personal Information in New Zealand and will only use this Personal Information in accordance with this Privacy Policy and the Privacy Act. If you are located outside of New Zealand, this Privacy Statement may not comply with the privacy regulations in your location.

### 2. Collection of Personal Information

- 2.1. We will collect and store any Personal Information that you submit to us in the course of your interaction and/or engagement with us, including without limitation, your name, identity details, photo identification, passport number, drivers licence number, work visa details, contact details, information about your education and employment history, including details provided in your curriculum vitae or resume such as your qualifications, talents, skills and abilities, information about your criminal history, and relevant health information.
- 2.2. We will collect Personal Information when you contact us, visit our website, make an enquiry, use, or request our services, apply to work, volunteer with us, or otherwise provide us with your personal information. This could include when you are a ConneXu service user, join as a ConneXu partner, or inquire about, or apply for, a job vacancy.

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2.3. When you visit our website, we do not automatically collect any Personal Information about you. However, we do collect information that does not identify you for the purposes of improving our service to you. This website information is collected by:

- a. Using cookies.
  - b. Collecting website use information including user location, and internet protocol (IP) addresses; and
  - c. Analytical tools that we may operate, including but not limited to Google Ads and Google Analytics. Google has its own privacy policy, which you are recommended to read [here](#).
- 2.4. A cookie is a small text file that our website may store on your device, which helps us improve your user experience when you use our website. Cookies will not collect identifiable information about you but will identify your device. You can modify the security settings in your internet browser to disallow the placement of Cookies on your electronic device, although this may impact your experience of our website.

### 3. How we may use Personal Information

3.1. We may use your Personal Information:

- a. to verify your identity.
  - b. to provide you with the services we offer.
  - c. to communicate with you.
  - d. to advocate for your needs and help you to access the right funding.
  - e. to respond to your requests, enquiries, feedback, or other customer service-related activities.
  - f. to consider you for volunteer and/or employment positions.
  - g. to assess or verify your skills, qualifications and/or experience, including to undertake checks to verify your work rights status, criminal history, and any other background checks required for positions we may have available from time to time.
  - h. to enable us to contact you and keep you safe when working/volunteering for us.
  - i. to provide our website to you, and to analyse and improve our website from time to time.
  - j. to further our relationship with you, including for our own marketing purposes.
  - k. to conduct research and statistical analysis (on an anonymised basis).
  - l. to protect and/or enforce our legal rights and interests, including defending any claim; and
  - m. for any other purpose authorised by you or permitted by law.
- 3.2. You may choose not to provide any Personal Information to us. However, as a result we may not be able to provide our services to you, communicate with you, process your request for assistance or job application, inform you of changes to our services, or respond to any related queries.

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3.3. We may use aggregated information to improve and develop our services, undertake statistical analysis, and meet our legal obligations. This aggregated information is not associated with any individual person and will not be used in a manner that would identify any individual personally.

#### 4. Storage and security of Personal Information

- 4.1. We take the security of your Personal Information seriously and require our personnel to comply with their legal obligations to protect your Personal Information.
- 4.2. We store information in physical and electronic records, at our premises and the premises of our service providers, which may include storage on the cloud. We take reasonable steps to ensure the safety of your Personal Information stored in both electronic and hard copy format, to protect Personal Information against loss, unauthorised access, use, modification, disclosure, or other misuse.
- 4.3. Any organisations that provide us with support services are required to appropriately safeguard the privacy of any Personal Information provided to them. Without limiting the foregoing, we or our service providers may store your Personal Information using third party cloud-based services and storage subject to appropriate safeguards. There is more information about disclosure of Personal Information overseas below in section 5.3.

#### 5. Disclosing Personal Information

- 5.1. We will not sell, lend, or trade Personal Information to any third party.
- 5.2. We will not disclose Personal Information to any third party, except for the purposes for which it was collected, and for directly related purposes, including:
  - a. providing our services to you.
  - b. communicating with you.
  - c. ensuring compliance with legal obligations.
  - d. for internal purposes relating to maintaining and improving our services.
  - e. engaging any third-party services or service providers required in connection with our services.
  - f. when you have authorised us to do so.
  - g. when we reasonably believe we are required or permitted to do so by law.
  - h. if we believe that the disclosure is reasonably necessary to enforce any legal rights or obligations we may have.
  - i. if we sell/transfer our business to a third party.
  - j. verifying your identity.
  - k. undertaking checks to verify your work rights status.
  - l. undertaking criminal history checks or obtaining criminal history records.
  - m. undertaking medical history checks.
  - n. where it is necessary to do so to resolve a complaint you make about us; and
  - o. if, in an emergency situation, it is necessary or desirable to share your Personal Information with a civil defence or government organisation, or another emergency service.

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- 5.3. If at any time we need to send Personal Information outside of New Zealand to an overseas agency that may use the information for its own purposes, we will:
- take steps to ensure that we believe on reasonable grounds that the overseas agency receiving the Personal Information is subject to privacy protections that, overall, provide comparable safeguards to those provided under New Zealand privacy laws; or
  - enter into a binding contractual agreement with the overseas agency receiving the Personal Information confirming that it will protect the Personal Information in a way that, overall, provides comparable safeguards to those provided under New Zealand privacy laws; or
  - obtain the express authorisation of the individual concerned to disclose their Personal Information overseas after expressly informing them that the overseas agency may not be required to protect the information in a way that, overall, provides comparable safeguards to those provided under New Zealand privacy law.

## 6. Accuracy and Retention of Personal Information

- It is your responsibility to ensure that the Personal Information you provide us is accurate, complete, and up-to-date. We will also take reasonable steps to ensure that your Personal Information is accurate, up to date, complete, relevant, and not misleading before using or disclosing it in accordance with this Privacy Policy. If you believe your Personal Information held by us is not accurate, incomplete, or otherwise requires amendment, please contact us immediately (at the details provided in clause 10).
- We will only retain Personal Information for as long as is required for the purposes for which it may be lawfully used. Where the Personal Information we collect is no longer required, we will securely destroy or delete the information or permanently de-identify.

## 7. Accessing and correcting Personal Information

- You may request access to the Personal Information we hold about you. You may also request the correction of any Personal Information we hold about you.
- We will comply with the provisions of the Privacy Act in responding to your request. Where we decide not to make a requested correction to your Personal Information, you may ask us to attach a statement of your requested correction to the information.
- In accordance with the Privacy Act, we have the right to, and may, charge a reasonable fee for processing or responding to any request to access or correct Personal Information.

## 8. Mandatory reporting of Notifiable Privacy Breaches

- If your Personal Information is involved in a privacy breach that we reasonably believe has caused or is likely to cause serious harm to you (a “**Notifiable Privacy Breach**”), we will comply with our obligations under the Privacy Act, which may involve informing you and recommend what steps you should take in response, and reporting the Notifiable Privacy Breach to the Office of the Privacy Commissioner.

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## **9. Changes to our Privacy Policy**

- 9.1. We may update or change our Privacy Policy at any time by providing you with at least 30 days' notice, which will be displayed on our website along with reasons for any change. If you have any questions about our Privacy Policy or any intended changes, please contact us.

## **10. Contact Us**

- 10.1. If you have any questions, concerns, or a complaint regarding privacy or information handling, please contact us at:

*Address:* ConneXu Head Office, 105 Sloane Street, Te Awamutu.

*Phone:* 07 871 8847

*Email:* [privacy@connexu.nz](mailto:privacy@connexu.nz)

- 10.2. We will respond to let you know who will be handling your matter and when you can expect a further response.

- 10.3. If you are not satisfied with how we have handled your complaint, you can contact the Office of the Privacy Commissioner on 0800 803 909 or [www.privacy.org.nz](http://www.privacy.org.nz).

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