

## HR POLICY MANUAL

### #11 – PRIVACY POLICY

#### SCOPE

This policy applies to the collection, holding, storage, use and disclosure by CORE50 Limited (the Company) (or a person acting on behalf of CORE50 Limited) of individuals' Personal Information in New Zealand.

#### PURPOSE

From time to time the Company may collect, hold, use and disclose personal information relating to its customers, contractors, suppliers and employees in the performance of its business activities.

This policy sets out guidelines to assist the Company and its workers comply with the requirements of the Privacy Act 2020 ("Privacy Act") and the Information Privacy Principles ("IPP") in relation to the collection, holding, storage, use and disclosure of individuals' Personal Information

#### DEFINITIONS

**Personal Information:** information about an identifiable individual

**Worker:** employee or contractor working with the Company

#### PROCEDURES

##### Collection of Personal Information

The Company may collect Personal Information for a lawful purpose connected with a function or activity of the Company and the collection of that information is necessary for that purpose. Personal Information must not be collected by means that are unfair or unreasonably intrusive.

A person who collects Personal Information on behalf of the Company must comply with this Policy and the requirements of the Privacy Act.

##### Use and Disclosure of Personal Information

The Company will not use or disclose Personal Information about an individual unless the Company believes on reasonable grounds that:

- a. The use or disclosure is for one of the purposes for which the information was obtained, or a directly related purpose;
- b. The disclosure is to the individual concerned;
- c. The information is in a form that does not identify the individual;
- d. The individual has authorized the use or disclosure; or
- e. The source of the information is a publicly available publication and it would not be unfair or unreasonable to use the information; or
- f. The use or disclosure is necessary to avoid prejudice to the maintenance of the law by any public sector agency, or for the enforcement of a law imposing a pecuniary penalty, or for the protection

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- of the public revenue, or for the conduct of proceedings before any court or tribunal; or
- g. The disclosure of the information is necessary to facilitate the sale or other disposition of a business as a going concern;
  - h. The use or disclosure is required or authorized by or under law; or
  - i. The use or disclosure is not inconsistent with the requirements of the Privacy Act

### Data Quality

The Company will, before using or disclosing Personal Information, take reasonable steps to make sure that the Personal Information is accurate, complete, up to date and not misleading.

### Data Security

The Company will take reasonable security safeguards to protect the Personal Information it holds from misuse and loss and from unauthorized access, modification or disclosure.

The Company will take reasonable steps to destroy or permanently de-identify Personal Information (such as a job applicant's resume) if it is no longer needed.

### Openness

This Privacy Policy will be made available to anyone who asks for it.

### Access and Correction

If the Company holds Personal Information about an individual, it will comply with legislative obligations to confirm whether the Company holds any Personal Information and provide the individual with access to the information on request by the individual

If the Company holds Personal Information about an individual and the individual requests the Company correct the information, the Company will comply with legislative obligations to correct the information so that it is accurate, complete, up to date and not misleading.

The Company will provide reasons for denial of access to Personal Information.

### Disclosure of personal information overseas

The Company will take reasonable care where Personal Information is to be disclosed to a foreign person or entity. The Company may disclose Personal Information overseas where the specific requirements of the Privacy Act are met. These requirements are intended to ensure that Personal Information disclosed overseas is subject to comparable safeguards, or where that may not be possible, that the individual is fully informed and authorizes disclosure.

### Mandatory reporting of serious privacy breaches

The Company is required to notify the Privacy Commissioner and affected individuals if it is aware that a notifiable privacy breach has occurred. A privacy breach is notifiable if it is reasonable to believe it has caused serious harm to an affected individual (or individuals) or is likely to do so.

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Any worker who becomes aware of a privacy breach, or potential privacy breach, must notify the Company's Privacy Office immediately.

### **Privacy Officer and Addresses**

The Company's Privacy Officer is their General Manager.

The Privacy Officer's role and responsibilities include:

- Encouraging compliance with the Information Privacy Principles;
- Dealing with requests made to the Company pursuant to the Privacy Act;
- Working with the Privacy Commissioner in relation to investigations; and
- Ensuring compliance with the Privacy Act
- The Company's address is: 89 Tauhara Road, Taupo.

<b>Version</b>	<b>Date</b>	<b>Revision Notes</b>	<b>Initials</b>
01	1 July 2021	Original CORE50 version	CE
02	12 Oct 2021	Change in privacy officer and company address	CM