

20. Privacy Policy

Created May 2022

20.1. Introduction

Development West Coast is the regional economic development agency for the West Coast region. Development West Coast's objectives are to promote employment opportunities and generate sustainable economic benefits for the West Coast. We aim to achieve this by investing in businesses and regional development projects that will benefit the West Coast now and in the future.

Development West Coast collects, holds and uses personal information about Employee's, Stakeholders, and other Individuals in order to fulfil our regulatory role and also as part of employing and engaging new staff.

20.2. Purpose

The privacy policy sets out the principles which are used by Development West Coast to collect, store, use and disclose personal information about employees, stakeholders, clients and other individuals.

Personal information at Development West Coast is subject to The Privacy Act 2020 and associated 13 Information Privacy Principles (external link) that cover the collection, handling and use of personal information.

20.3. Objectives

Development West Coast is committed to ensuring that it handles personal information using best practice and in a way that respects the privacy rights of employees, stakeholders and other individuals.

The objectives of Development West Coast's privacy policy is summarised as:

- a) Maintaining a positive "privacy culture" in which Development West Coasts employees and contractors are supported and encouraged to adopt good privacy practices.
- b) Ensuring legal compliance.
- c) Building trust and confidence with members of the public by:
 - Ensuring there are clear purposes for collecting personal information.
 - Good data collection processes.
 - Transparency in handling personal information.
 - Risk avoidance – avoiding the potential for security of data breaches.
 - Ensuring accuracy of personal information
 - Proper use and disclosure of personal information

20.4. Collection of Personal Information

The personal information Development Westcoast collects may include:

- | | | |
|-------------------------------|-------------------------------|------------------------------|
| ▪ Name | ▪ Passports/ Drivers Licenses | ▪ Gender |
| ▪ Date of Birth | ▪ Company Information | ▪ Household arrangement |
| ▪ Address or area you live in | ▪ Financial Information | ▪ Prior criminal convictions |
| ▪ Email Address | ▪ Insurance Details | ▪ Credit score and history |
| ▪ Phone Numbers | ▪ Age | |

DWC may collect personal information about you when you, or someone authorised to act on your behalf, provides information to us directly. For example, when you:

- a) Apply for employment with us.
- b) Correspond with us, whether in person, by letter, phone, text, email, instant messages or other means of communication.
- c) Complete and submit forms we provide for applications for funding or other authorisations.
- d) Use of any of our services or facilities, including signing up for funding or other authorisations.
- e) Subscribe to any of our Newsletters or update services.

- f) Follow or post comments in response to our social media or other facilities such as Facebook, Twitter, LinkedIn and You Tube.

We may keep a record of any information that you acquire from us. We may collect personal information about you from other organisations or persons, such as:

- g) Solicitors/ conveyancers.
- h) Our Website hosting or internet service providers.
- i) Credit reporting agencies, and other organisations and persons where you have expressly authorised them to provide us with information.

20.5. How we use your Information?

The personal information that we collect from you, or someone authorised to act on your behalf, may be used by us for any of the following purposes:

- a) To provide you with services or facilities - including those you have requested, and those Development West Coast has provided to you.
- b) To positively confirm your identity. This is to avoid inappropriate release or use of your information.
- c) To respond to correspondence or to provide you with information or services that you have requested, including in relation to any submission you have made to us.
- d) To process your application for any funding, business support or other authorisation for which you have applied.
- e) To process your application to use or to register for any of our services or facilities, including our online services.
- f) To manage your use of any of our services or facilities.
- g) To process payments received, or made, by us.
- h) To respond to your requests, enquiries or feedback, or for customer care related activities; including communicating to other persons you have authorised us to deal with on your behalf.
- i) To seek your feedback on our services or facilities you have used. This will help us better understand who is using our services and facilities and how these can be improved. You can contact us if you don't want to be included in these types of surveys.
- j) To provide you with information about our events, news, services or facilities, or the events, news, services or facilities of Development West Coast, that we consider may be of interest to you.
- k) To carry out activities connected with the running of our business or operations such as personnel training, testing and maintenance of computer and other systems or processes, or ensuring the information we hold about you is consistent across the organisation.
- l) Carrying out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.
- m) For general administrative and business purposes.

20.6. Sharing your Information

- a) Any person or organisation we use to provide products or services to you on our behalf, where your personal information is necessary for the provision of those products or services.
- b) Our agents, service providers (including website hosting providers) and any other third parties to the extent this is necessary to make our services and facilities available to you, or in connection with any of the purposes set out in this statement. We will only provide such third parties the relevant information required for the provision of the services, and the third parties are prohibited from using such personal information for any other purpose.
- c) A third party if we are required to do so under any legislation, or in the course of legal proceedings or other investigations. This may include:
 - Persons to whom we may be required to pass your information by reason of legal, governmental, or regulatory authority including law enforcement agencies and emergency services.
 - Governmental organisations, such as Inland Revenue Department or Ministry of Business, Innovation and Employment; or
 - A debt collector agency to recover overdue materials or charges.
- d) Any person to whom you authorise us to disclose your personal information.
- e) We do not sell personal information to any external parties.

20.7. What if you do not provide us with the personal information requested?

If personal information is requested by Development West Coast, but you fail to provide this information, we may not be able to adequately:

- a) Respond to your correspondence
- b) Process any applications you have submitted
- c) Provide the services or facilities you have requested
- d) Process payments or otherwise deal with any requests or enquiries you have made.

In some circumstances, failure to provide information when requested may be unlawful, and/or result in legal consequences. These circumstances and the potential consequences will be explained to you when your personal information is collected.

20.8. Keeping your information safe and accurate

Looking after your information is our priority. We are committed to protecting your personal information and take reasonable steps to ensure it is:

- protected against loss, damage, misuse and unauthorised access. We restrict access to personal information to those individuals who need access to this information in order to assist us in performing our duties and obligations
- Accurate, up to date, complete, relevant, and not misleading.

20.9. How long will we keep your personal information?

The length of time we keep your personal information depends on what it is and whether we have an ongoing need to retain it (for example, to provide you with a service you've requested).

We may retain all personal information that we collect (on both our active systems and our archive systems), for as long as administratively necessary.

To determine the appropriate retention period of your information, we consider the nature, sensitivity, appropriate legal obligations, the potential risk of harm from unauthorised disclosure, the purposes for which we process your information and whether these purposes can be achieved through alternative means.

We are required to keep records of our business under the Public Records Act 2005, which requires us to retain "protected records" indefinitely.

20.10. Accessing and correcting your personal information

You may request confirmation of whether or not we hold any personal information about you, and you may request access to your personal information that we hold by emailing us at info@dwc.org.nz or otherwise contacting us, at the addresses provided below.

Once we have verified your identity, we will provide you with such confirmation and access unless one of the grounds for refusal to do so under the Privacy Act applies. You may request that the personal information we hold about you be corrected by emailing us at info@dwc.org.nz.

20.11. How we maintain best privacy practice

Development West Coast is committed to maintaining best privacy practice through:

- Ensuring all staff understand privacy rights and are kept up to date through training.
- Ensuring that all requests for disclosure of personal information or new projects involving personal information are referred to the Privacy Officer for review.
- Undertaking reviews of privacy policies and procedures on at least a bi-annual basis and following up any specific privacy issues which may arise.
- Keeping abreast of privacy law developments, technology updates and following best practice guidance from the Privacy Commissioner.
- Responding to privacy concerns and/ or complaints in a timely and constructive way.

20.12. Action where there is a potential privacy breach

Inadvertent privacy breaches may happen despite good processes and the best of intentions. Where a potential breach is identified it is important to act quickly and openly.

As soon as a breach is detected, Development West Coast personnel are required to advise their manager and notify the Privacy Officer. The Privacy Officer will work with staff to address any privacy concerns, following the Privacy Commissioner's guidelines for dealing with privacy breaches available at www.privacy.org.nz

20.13. Who can you contact for further information?

If you have any queries about this Privacy Statement or personal data we have collected, please contact:

Development West Coast
Email address: info@dwc.org.nz
Postal Address: PO Box 451, Greymouth 7840