

# Speldhurst Country Estate

## PRIVACY POLICY

### AIM:

All residents will feel their personal details are safe within the village, understanding the information collected is only for the purposes linked to our organisational functions and services; and to make people aware of the collection of information, the purpose for doing so, their rights to access and correct that information.

### POLICY:

Speldhurst Country Estate (**we, us, our**) complies with the New Zealand Privacy Act 2020 (the **Act**) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

This policy sets out how we will collect, use, disclose and protect your personal information.

This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

### COLLECTING PERSONAL INFORMATION

We collect personal information from you, including information about your:

- ⇒ Name
- ⇒ Contact information
- ⇒ Birthdate
- ⇒ Gender
- ⇒ Billing or purchase information
- ⇒ Relevant medical history
- ⇒ Information relating to Enduring Powers of Attorney

Providing some information is optional. If you choose not to enter any of the information we collect, we may be unable to provide you with some services.

### POLICY:

We collect personal information about you from:

- ⇒ you, when you provide that personal information to us, through any contact with us (e.g. in person, in writing, telephone call, app or email), and
- ⇒ third parties where you have authorised this or the information is publicly available.
- ⇒ We may collect or obtain personal information and health information (where applicable) from authorised third parties and as permitted by applicable privacy laws. These third parties may include your family members, your medical providers (such as GP or hospital), or other referring agencies. Information may also be collected from government agencies including Te Whatu Ora/ Ministry of Health, Ministry of Social Development, Ministry of Justice and New Zealand Police.

If possible, we will collect personal information from you directly.

## USING PERSONAL INFORMATION

We will use your personal information:

- ⇒ to verify your identity
- ⇒ for administration purposes
- ⇒ to bill you and to collect money that you owe us
- ⇒ to respond to communications from you
- ⇒ to conduct research and statistical analysis (on an anonymised basis)
- ⇒ to protect and/or enforce our legal rights and interests, including defending any claim
- ⇒ to provide services and products to you
- ⇒ for any specific purpose that we notify at the time the personal information is collected
- ⇒ for any other purpose authorised by you or the Act

Besides our employees, we may disclose your personal information to:

- ⇒ the Speldhurst Country Estate Board or the Managing Director if/when applicable
- ⇒ any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website, Spelcom app or other services and products
- ⇒ other third parties (for anonymised statistical information)
- ⇒ a person who can require us to supply your personal information (e.g., a regulatory authority)
- ⇒ any other person authorised by the Act or another law (e.g., a law enforcement agency)
- ⇒ any other person authorised by you
- ⇒ A business that supports our services and products which may be located outside New Zealand, which may mean your personal information is held and processed outside New Zealand.
- ⇒ To provide you with information about events and services.
- ⇒ To carry out activities and services connected with the running of our business.
- ⇒ To perform a contract with you.
- ⇒ To assess any application you may make to us.
- ⇒ To improve the services we provide to you.

We do not sell, rent, or lease your personal information to third parties.

## STORING AND PROTECTING YOUR PERSONAL INFORMATION

Your personal information can be stored in physical files in the Speldhurst Country Estate office, in a shared file, as well as on an electronic database provided by a third party.

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

## RETENTION OF PERSONAL INFORMATION

We will not keep personal information for longer than is necessary to achieve the purpose for which we may lawfully use or retain it.

## ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction.

If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

It is your responsibility to ensure we hold the most up-to-date information, and you are to advise us of any changes required from time to time to ensure the information we hold is accurate.

#### CHANGES TO THIS POLICY

We may change this policy by uploading a revised policy onto the website. The change will apply from the date that we upload the revised policy.

#### RELATED DOCUMENTS:

The following are referenced or have an impact on this policy standard:

Additional Policy documents	Safety and Personal Security of Residents Policy
Relevant legislation	Privacy Act 2020 Health Information Privacy Code 2020 Coroners Act 2006 Employment Relations Act 2000 Health Act 1956 Health and Disability Commissioner Act 1994 Health (Retention of Health Information) Regulations 1996 Health Practitioners Competence Assurance Act 2003 Health and Disability Commissioner (Code of Health and Disability Services Consumers' Rights) Regulations 1996 Health and Safety at Work Act 2015 Unsolicited Electronic Messages Act 2007

#### CCTV:

We may use CCTV and IP cameras to record footage at our facilities. We may use CCTV footage for the purpose of investigating, deterring and detecting criminal behaviour and other incidents at our village, and for the wellbeing, safety and security of residents and staff, property and visitors. We will ensure that the monitoring of CCTV does not unreasonably intrude on situations where there is an expectation of privacy. Signage advising that cameras are in operation will be installed in accordance with the Privacy Act 2020. Only approved persons will be permitted to access CCTV images and CCTV footage.