

Privacy Policy of **Grace Removals Group Ltd, New Zealand**

This Application collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

POLICY SUMMARY

Personal Data processed for the following purposes and using the following services:

- **Analytics**
 - **Display Advertising extension for Google Analytics, Google Ads conversion tracking and Google Analytics**
Personal Data: Cookies; Usage Data
 - **Google Analytics (Universal Analytics) with anonymized IP**
Personal Data: Trackers; Usage Data
 - **Google Analytics 4**
Personal Data: number of Users; session statistics; Trackers; Usage Data
- **Contacting the User**
 - **Contact form**
Personal Data: address; country; email address; first name; last name; phone number; ZIP/Postal code
- **Remarketing and behavioural targeting**
 - **Facebook Remarketing and Google Ads Remarketing**
Personal Data: Cookies; Usage Data
- **Spam and bots protection**
 - **Google reCAPTCHA**
Personal Data: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data
 - **hCaptcha**
Personal Data: mouse movements
- **Tag Management**
 - **Google Tag Manager**
Personal Data: Usage Data
- **Traffic optimization and distribution**
 - **Smush**
Personal Data: metadata

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

Users may also opt out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Further information about the processing of Personal Data

- **GRACE REMOVALS GROUP LTD Privacy Policy**
Grace Removals Group Ltd (New Zealand) is bound by the NZ Privacy Act 2020 and the Information Privacy Principles (IPPs) contained in this Act (collectively referred to as the Privacy Act). Grace adopts the IPPs as Standard Privacy Principles across all Grace New Zealand entities.

The purpose of this Policy is to provide you with information in relation to how we collect, treat and manage your Personal Information (as defined in Part 3 s22 of the Privacy Act 2020). It also describes how customers may access and amend Personnel Information held by us on your behalf.

This includes:

- the kinds of Personal Information that we collect and hold about you;
- how we collect and hold your Personal Information;
- the purposes for collecting, holding, using and disclosing your Personal Information;
- how you may access your Personal Information held by us and correct that information where it is incorrect;
- how you may make a complaint about the way we collect, hold, use or disclose Personal Information, and how we will deal with Privacy related complaints; and
- whether we will (or are likely to) disclose your personal information to overseas recipients and the countries where such recipients may be located.

You can choose to interact with us anonymously or by using a pseudonym if such interaction is general in nature. However, if the interaction is specific to an account or relates to your Personal Information, we will need to identify you before we can engage in further discussions and correspondence.

We will keep this Privacy Policy up to date and published on our website.

1. How we collect your Personal Information

We will only collect Personal Information from you for business purposes only, which include providing Home, Corporate and Commercial Services (Primary Purpose). Such Personal Information collected includes contents and locations of items stored with us.

We also collect and hold Personal Information for secondary purposes. These include

- customers' names and addresses for contact and billing;
- information relating to previous services provided by Grace or Crown;
- details of persons authorised to access information; and
- employment or financial information.

(Collectively referred to as Secondary Purposes).

The information obtained for Secondary Purposes will not be used or disclosed otherwise than in accordance with Part 2 of this Privacy Policy.

We require you to notify individuals prior to disclosing Personal Information that you will:

- Disclose their Personal Information to us, and
- Describe the services we will provide.

We will keep your records in secured premises. Your records, including any Personal Information contained in them, will not be passed on to a third party without your consent unless specified by law.

In consideration of us providing our services you warrant that:

- You have obtained the consent from relevant individuals to provide their Personal Information to us;
- You are not aware that the collection of the Personal Information by us will infringe the rights of any third party;
- You have consent from relevant individuals for us to provide our services in respect of their Personal Information.

We will notify you concerning matters listed below before collecting any Personal Information:

- the Primary Purpose for collecting your Personal Information;
- other related uses or disclosures that we may make of the Personal Information (Secondary Purposes);
- the main consequences (if any) for you if you do not provide all or some of the Personal Information;
- our identity and how you can contact us and access or seek correction of the Personal Information that we hold about you;
- how you may make a complaint about any alleged breach of the Privacy Act by us;
- whether we are likely to disclose the Personal Information to overseas recipients and if so, the countries where such recipients are likely to be located; and
- the organisations or types of organisations to whom we usually disclose the Personal Information including contractors.

Some elements of Personal Information are also referred to as Sensitive Information (as defined in s22 of the Privacy Act 2020)

We will only collect Sensitive Information:

- with your consent; or
- when permissible under New Zealand law, and will only use such information for a legitimate purpose where this is reasonably necessary.

2. How we use and disclose your Personal Information

We may use personal information for its primary purpose of collection (e.g. the delivery of services to the person) or for any related secondary purpose that we could reasonably be expected to use the personal information for.

We will not use or disclose Personal Information about an individual other than for providing the services agreed upon unless required to do so by law. For example, we may disclose Personal Information to law enforcement agencies, government agencies, courts or external advisers where permitted or required by law.

We will not copy or exploit any Personal Information provided to us. In certain circumstances, we may use personal information for promotional or direct marketing purposes. However, a person may at any time request we not to use their personal information for sending direct marketing material to that person. Such a request can be made by contacting Grace either in writing, by email or by telephone at the contact details below. There is no fee for making such a request.

We will take reasonable steps to ensure that our contractors also comply with the requirements of the Privacy Act however, we accept no responsibility for the actions of our contractors and will not be liable for any claims arising as a result of a breach of the Privacy Act by our contractors.

We may disclose Personal Information to law enforcement agencies, government agencies, courts or external advisers where permitted or required by law.

We may disclose Personal Information to avoid an imminent threat to a person's life or to public safety or as required legally based on the reasonable grounds referred to (s22 IPP11) and as per the terms of the Privacy Act.

3. How we protect your Personal Information

We will take such steps as are reasonable in the circumstances to protect all collected Personal Information from misuse, interference and loss. This includes, but is not limited to the following:

1. Ensuring that all of our employees and contractors perform their duties in a manner that is consistent with our legal responsibilities under the Privacy Act.
2. Ensuring that paper and electronic records containing Personal Information are stored in facilities that are only accessible by authorised employees, agents and contractors.

Information Security

We use a variety of security technologies and procedures, including Secure Socket Layer (SSL) encryption, to help protect your personal information from unauthorized access, use, or disclosure. For more information of how Grace protects information, refer to Grace Information Security Policies & Procedures.

Storage and Data Security

Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the New Zealand Government's records management regime. We will take steps to destroy or de-identify Personal Information after as short a time as possible after being notified by you that the information should be destroyed, unless the law requires otherwise.

We take all reasonable steps to protect the personal information held in our possession against loss, unauthorised access, use, modification, disclosure or misuse.

4. Access to, and Correction of your Personal Information

We will take all reasonable steps to ensure that the Personal Information that we collect and hold is accurate, up to date and complete.

We will:

- a. grant you access to; and/or
- b. correct, our records containing Personal Information about you as soon as practically possible at your request in accordance with the Privacy Act.

Should you wish to lodge a request to access and/or correct your Personal Information, you should do so by contacting our Privacy Officer (details of our Privacy Officer are set out in clause 7).

We reserve the right to charge you for the reasonable cost incurred by us in providing access to your Personal Information in accordance with this Privacy Policy. For the avoidance of doubt, such charges will not apply to the making of any such request for access to your Personal Information by you.

If there is a reason we are unable to agree to a request for access to your Personal Information, we will advise you of this in writing. Some examples of why we may refuse a request for access include, where providing the information:

- a. may pose a threat to the health or safety of an individual or the public;
- b. may have an unreasonable impact on the privacy of another individual;
- c. is not allowed by law; or
- d. may reveal internal information relating to a commercially sensitive decision making process.

5. Complaints

If you wish to voice a complaint about:

- a. an alleged breach of the IPPs by us; and/or
- b. an alleged breach of a registered IPP code by us,

then you should contact our Privacy Officer (details of our Privacy Officer are set out in clause 8).

Once a complaint is officially lodged with our Privacy Officer, it will be dealt with confidentially in accordance with our Complaints Handling Policy. This policy may be found in the Integrated Business Management System Document Database.

6. Transferring Personal Information Overseas

If Personal Information is sent overseas, we will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with the New Zealand Information Privacy Principles (s22 of the Privacy Act).

7. Privacy Officer and Contact Procedure

Our Privacy Officer is Angela Jackson. The contact information for our Privacy Officer is as follows:

- a. Phone – +64 7 575 3004
- b. Email – ajackson@grace-removals.co.nz
- c. Hours – 8.00am – 5.00pm.

You should contact the Privacy Officer with respect to all requests relating to access, complaints or correction of your Personal Information under this Policy.

The Privacy officer will take your enquiry and provide you with a response within a reasonable time period.

Contact information

- **Owner and Data Controller**
Grace Removals Ltd. – 38d Highbrook Drive, Auckland, 2013, New Zealand
Grace Removals Ltd - 9/15 John Sneddon Drive, Todd Park, Porirua, 5022, New Zealand
Owner contact email: agoodman@grace-removals.co.nz

FULL POLICY

Owner and Data Controller

Grace Removals Ltd - 9/15 John Sneddon Drive, Todd Park, Porirua, 5022, New Zealand

Owner contact email: agoodman@grace-removals.co.nz

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: first name; last name; phone number; address; country; email address; ZIP/Postal code; Cookies; Usage Data; number of Users; session statistics; metadata; answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Analytics, Remarketing and behavioral targeting, Tag Management, Traffic optimization and distribution and Spam and bots protection.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behaviour.

Display Advertising extension for Google Analytics (Google Inc.)

Google Analytics on this Application might use Google's Interest-based advertising, 3rd-party audience data and information from the DoubleClick Cookie to extend analytics with demographics, interests and ads interaction data.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Google Ads conversion tracking (Google Inc.)

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on this Application.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#).

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Google Analytics (Universal Analytics) with anonymized IP (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

Google Analytics 4 (Google Ireland Limited)

Google Analytics 4 is a web analysis service provided by Google Ireland Limited (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting [Google’s official documentation](#).

Personal Data processed: number of Users; session statistics; Trackers; Usage Data.

Place of processing: Ireland – [Privacy Policy](#) – [Opt Out](#).

- **Contacting the User**

Contact form (This Application)

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form’s header.

Personal Data processed: address; country; email address; first name; last name; phone number; ZIP/Postal code.

- **Remarketing and behavioural targeting**

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the [Network Advertising Initiative opt-out page](#).

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

Google Ads Remarketing (Google Inc.)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Application with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's [Ads Settings](#).

Personal Data processed: Cookies; Usage Data.

Place of processing: US – [Privacy Policy](#) – [Opt Out](#).

- **Spam and bots protection**

This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from unwanted parts of traffic, messages and content that are recognized as spam or protecting it from malicious bots activities.

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC.

The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

hCaptcha (Intuition Machines, Inc)

hCaptcha is a SPAM protection service provided by Intuition Machines, Inc.

Personal Data processed: mouse movements.

Place of processing: United States – [Privacy Policy](#).

- **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google Inc.)

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Usage Data.

Place of processing: US – [Privacy Policy](#).

- **Traffic optimization and distribution**

This type of service allows this Application to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Application and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

Smush (Incsb, LLC)

Smush is a traffic optimization and distribution service provided by Incsub, LLC. The service optimizes images used on this Application and may serve them to Users in order to optimize the loading times on this Application.

Personal Data processed: metadata.

Place of processing: United States – [Privacy Policy](#).

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by [YourOnlineChoices](#) (EU), the [Network Advertising Initiative](#) (US) and the [Digital Advertising Alliance](#) (US), [DAAC](#) (Canada), [DDAI](#) (Japan) or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called [AppChoices](#) that helps Users to control interest-based advertising on mobile apps.

Users may also opt out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

Further information about the processing of Personal Data

- **GCW Holdings Pty Ltd. Privacy Policy**

GCW Holdings Pty Ltd, Grace Removals (Australia) Pty Ltd, Crown Worldwide (Australia) and Grace Records Management (Australia) Pty Ltd, (us, our, we) is bound by the Privacy Act 1988 (Cth) and the Privacy Principles (APPs) (collectively referred to as the Privacy Act). Grace Removals New Zealand is bound by the Privacy Act 2020 and the Privacy Principles (IPPs) (collectively referred to as the Privacy Act. Grace adopts the APPs/IPPs as Standard Privacy Principals across all Grace entities as per applicable countries.

The purpose of this Policy is to provide you with information in relation to how we collect, treat and manage your Personal Information (as defined the associated Privacy Act). It also describes how customers may access and amend Personnel Information held by us on your behalf. The rights of Users are based on the General Data Protection Regulation (GDPR)

This includes:

- the kinds of Personal Information that we collect and hold about you;
- how we collect and hold your Personal Information;
- the purposes for collecting, holding, using and disclosing your Personal Information;
- how you may access your Personal Information held by us and correct that information where it is incorrect;
- how you may make a complaint about the way we collect, hold, use or disclose Personal Information, and how we will deal with Privacy related complaints; and
- whether we will (or are likely to) disclose your personal information to overseas recipients and the countries where such recipients may be located.

You can choose to interact with us anonymously or by using a pseudonym if such interaction is general in nature. However, if the interaction is specific to an account or relates to your Personal Information, we will need to identify you before we can engage in further discussions and correspondence.

We will keep this Privacy Policy up to date and published on our website.

1. How we collect your Personal Information

We will only collect Personal Information from you for business purposes only. which include providing Home, Corporate and Commercial Services (Primary Purpose). Such Personal Information collected includes contents and locations of items stored with us.

We also collect and hold Personal Information for secondary purposes. These include

- customers' names and addresses for contact and billing;
- information relating to previous services provided by Grace or Crown;
- details of persons authorised to access information; and
- employment or financial information.

(Collectively referred to as Secondary Purposes).

The information obtained for Secondary Purposes will not be used or disclosed otherwise than in accordance with Part 2 of this Privacy Policy.

We require you to notify individuals prior to disclosing Personal Information that you will:

- Disclose their Personal Information to us, and
- Describe the services we will provide.

We will keep your records in secured premises. Your records, including any Personal Information contained in them, will not be passed on to a third party without your consent unless specified by law.

In consideration of us providing our services you warrant that:

- You have obtained the consent from relevant individuals to provide their Personal Information to us;
- You are not aware that the collection of the Personal Information by us will infringe the rights of any third party;
- You have consent from relevant individuals for us to provide our services in respect of their Personal Information.

We will notify you concerning matters listed below before collecting any Personal Information:

- the Primary Purpose for collecting your Personal Information;
- other related uses or disclosures that we may make of the Personal Information (Secondary Purposes);
- the main consequences (if any) for you if you do not provide all or some of the Personal Information;
- our identity and how you can contact us and access or seek correction of the Personal Information that we hold about you;
- how you may make a complaint about any alleged breach of the Privacy Act by us;
- whether we are likely to disclose the Personal Information to overseas recipients and if so, the countries where such recipients are likely to be located; and
- the organisations or types of organisations to whom we usually disclose the Personal Information including contractors.

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- when permissible under New Zealand law, and will only use such information for a legitimate purpose where this is reasonably necessary.

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We may use personal information for its primary purpose of collection (e.g. the delivery of services to the person) or for any related secondary purpose that we could reasonably be expected to use the personal information for.

We will not use or disclose Personal Information about an individual other than for providing the services

agreed upon unless required to do so by law. For example, we may disclose Personal Information to law enforcement agencies, government agencies, courts or external advisers where permitted or required by law.

We will not copy or exploit any Personal Information provided to us. In certain circumstances, we may use personal information for promotional or direct marketing purposes. However, a person may at any time request we not to use their personal information for sending direct marketing material to that person. Such a request can be made by contacting Grace either in writing, by email or by telephone at the contact details below. There is no fee for making such a request.

We will take reasonable steps to ensure that our contractors also comply with the requirements of the Privacy Act however, we accept no responsibility for the actions of our contractors and will not be liable for any claims arising as a result of a breach of the Privacy Act by our contractors.

We may disclose Personal Information to law enforcement agencies, government agencies, courts or external advisers where permitted or required by law.

We may disclose Personal Information to avoid an imminent threat to a person's life or to public safety or as required legally based on the reasonable grounds referred to s22 IPP11 and as per the terms of the Privacy Act.

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1. Ensuring that all of our employees and contractors perform their duties in a manner that is consistent with our legal responsibilities under the Privacy Act.
2. Ensuring that paper and electronic records containing Personal Information are stored in facilities that are only accessible by authorised employees, agents and contractors.

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We use a variety of security technologies and procedures, including Secure Socket Layer (SSL) encryption, to help protect your personal information from unauthorized access, use, or disclosure. For more information of how Grace protects information, refer to Grace Information Security Policies & Procedures.

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Storage of personal information (and the disposal of information when no longer required) is managed in accordance with the New Zealand Government's records management regime. We will take steps to destroy or de-identify Personal Information after as short a time as possible after being notified by you that the information should be destroyed, unless the law requires otherwise.

We take all reasonable steps to protect the personal information held in our possession against loss, unauthorised access, use, modification, disclosure or misuse.

4. Access to, and Correction of your Personal Information

We will take all reasonable steps to ensure that the Personal Information that we collect and hold is accurate, up to date and complete.

We will:

- a. grant you access to; and/or
- b. correct, our records containing Personal Information about you as soon as practically possible at your

request in accordance with the Privacy Act.

Should you wish to lodge a request to access and/or correct your Personal Information, you should do so by contacting our Privacy Officer (details of our Privacy Officer are set out in clause 7).

We reserve the right to charge you for the reasonable cost incurred by us in providing access to your Personal Information in accordance with this Privacy Policy. For the avoidance of doubt, such charges will not apply to the making of any such request for access to your Personal Information by you.

If there is a reason we are unable to agree to a request for access to your Personal Information, we will advise you of this in writing. Some examples of why we may refuse a request for access include, where providing the information:

- a. may pose a threat to the health or safety of an individual or the public;
- b. may have an unreasonable impact on the privacy of another individual;
- c. is not allowed by law; or
- d. may reveal internal information relating to a commercially sensitive decision making process.

5. Complaints

If you wish to voice a complaint about:

- a. an alleged breach of the IPPs by us; and/or
 - b. an alleged breach of a registered IPP code by us,
- then you should contact our Privacy Officer (details of our Privacy Officer are set out in clause 7).

Once a complaint is officially lodged with our Privacy Officer, it will be dealt with confidentially in accordance with our Complaints Handling Policy. This policy may be found in the Integrated Business Management System Document Database.

6. Transferring Personal Information Overseas

If Personal Information is sent overseas, we will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with the New Zealand Privacy Principles and the Privacy Act.

7. Privacy Officer and Contact Procedure

Our Privacy Officer is Angela Jackson. The contact information for our Privacy Officer is as follows:

- a. Phone – +64 7 575 3004
- b. Email – ajackson@grace-removals.co.nz
- c. Hours – 8.00am – 5.00pm.

You should contact the Privacy Officer with respect to all requests relating to access, complaints or correction of your Personal Information under this Policy.

The Privacy officer will take your enquiry and provide you with a response within a reasonable time period.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details

about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by this Application as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to this Application, if not stated otherwise within this document.

Latest update: October 20, 2023

iubenda hosts this content and only collects the Personal Data strictly necessary for it to be provided.