



team:grace

Privacy Policy

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 Principals 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.

Scope

In accordance with the privacy laws of the countries in which Grace operates, this Policy outlines how Grace manages the collection, use, disclosure and handling of, or otherwise processes the personal data of its customers, the personnel of customers, receivers of cargo consigned to us or our services, visitors to Grace's websites or premises, Grace's employees and contractors, a contact at one of Grace's suppliers or other business partners, and others with whom Grace deals with (you) in accordance with these legal requirements.

Unless otherwise stated, Grace is the data controller for personal data we collect from you or you provide to us.

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.

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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;
- 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 Section 0 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; and
- 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).

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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.

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.

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:

- 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; and
- 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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Information Security

We use a variety of best practices to secure communications including session encryption and security 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.

Access, Correction and Retention of 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:

- grant you access to; and/or
- correct,

our records containing Personal Information about you as soon as practically possible at your request in accordance with the Privacy Act and GDPR.

To ensure the integrity and security of personal data, Grace only discloses the personal data it holds to the individual concerned, their legally authorised representative, or to fulfil legal or regulatory requirements. In some circumstances we may charge a fee only in accordance with applicable law, and in any case not where the processing of your personal data is regulated by the GDPR. To ascertain what fee we may charge, please contact the Privacy Officer.

Should you wish to lodge a request to access and/or correct your Personal Information, you should do so by contacting our Privacy Officer.

We will keep personal data for as long as is necessary in accordance with our records management policies for the purpose or purposes for which they were collected. We will take all reasonable steps to delete from our systems, all data which is no longer required. Grace will delete any personal data we hold about you when it is no longer required, and we are legally able to do so.

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:

- may pose a threat to the health or safety of an individual or the public;

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- may have an unreasonable impact on the privacy of another individual;
- is not allowed by law; or
- may reveal internal information relating to a commercially sensitive decision-making process.

Complaints

If you wish to voice a complaint about:

- an alleged breach of the New Zealand Privacy Principle's by us; and/or
- an alleged breach of a registered New Zealand Privacy Principles 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 Grace Integrated Management System.

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, Privacy Act and GDPR.

Privacy Officer and Contact Procedure

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

Phone – +64 7 575 2511 / 027 296 2559

Email – ajackson@grace-removals.co.nz

Hours – 8:30am – 5:30pm

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.

Leon Hulme
Managing Director