

Privacy Policy



Category:	Operational
Approved by:	Board of Trustees
Policy Effective Date:	April 2022
Last Review Date	June 2023
Next Review Date:	June 2026 (every 3 years)

1. Purpose

We understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our website and funding, and otherwise providing charitable activities (**Services**) to you. In this Privacy Policy **we, us** or **our** means Central Lakes Trust NZBN 9429043069224.

2. Personal information

Personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

3. The personal information we collect

The types of personal information we may collect about you include:

- your name;
- images of you;
- your location information (for example your GPS location);
- your contact details, including email address, mailing address, street address and/or telephone number;
- your age and/or date of birth;
- bank account number;
- your preferences and/or opinions;
- the organisation you work for, if applicable;
- your charities services registration number, if applicable;
- information you provide to us through customer surveys;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and

- any other personal information requested by us and/or provided by you or a third party.

4. How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you register for an account, through the 'contact us' form on our website or when you request our assistance via email, our online chat or over the telephone.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as details of your use of our website from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies.

5. Collection and use of personal information

Personal information: We may collect, hold, use and disclose personal information for the following purposes:

- to verify your identity, assess your application and ensure you meet our funding eligibility criteria;
- to provide our Services to you, including to provide you with funding;
- to enable you to access and use our associated applications;
- to contact and communicate with you about our Services, including to respond to any requests submitted by you;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services, associated applications;
- prepare reports on community funding impact outcomes and case studies;
- for advertising and marketing, including to send you promotional information about our products and services and information that we consider may be of interest to you, noting we will comply with all laws that are relevant to marketing (including the Unsolicited Electronic Messages Act 2007 and Fair Trading Act 1986);
- to comply with our legal obligations and resolve any disputes that we may have;
- if you have applied for employment with us; to consider your employment application; and
- if otherwise required or authorised by law.

6. Disclosure of personal information to third parties

When required we may disclose personal information when required for work purposes or by law to:

- third party service providers for the purpose of enabling them to provide their services, to us, including (without limitation) IT service providers, such as Focus Technology, data storage, web-hosting and server providers, such as Fluxx, email marketing providers, debt collectors, couriers, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;

- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time), Facebook Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure: Where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of New Zealand, including but not limited to, the United States of America, which may not have an equivalent level of data protection laws as those in New Zealand. Before disclosing any personal information to an overseas recipient, we will comply with Information Privacy Principle 12 and only disclose the information if:

- you have authorised the disclosure after we expressly informed you that the overseas recipient may not be required to protect the personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act;
- we believe the overseas recipient is subject to the Privacy Act;
- we believe that the overseas recipient is subject to privacy laws that, overall, provide comparable safeguards to those in the Privacy Act;
- we believe that the overseas recipient is a participant in a prescribed binding scheme;
- we believe that the overseas recipient is subject to privacy laws in a prescribed country; or
- we otherwise believe that the overseas recipient is required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act (for example pursuant to a data transfer agreement entered into between us and the overseas recipient).

7. Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Anonymity: Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. You also have the right to contact the Office of the New Zealand Privacy Commissioner.

8. Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

9. Cookies

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online Services and allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.

10. Links to other websites

Our Services may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

11. Breach of Privacy

On notification of a breach of privacy CLT will immediately investigate to determine if the breach is notifiable using resources on the Office of the Privacy Commissioner's (OPC) website. If the breach is notifiable we will contact the people involved (unless an exception applies) along with the OPC. We will aim to do this within 72 hours of the notification or as soon as practically possible. All other breaches of privacy will be investigated on a case by case basis using the Privacy Breach Guidelines on the OPC website.

12. Amendments

We may, at any time and at our discretion, vary this Privacy Policy and will bring this to your attention when you go to our website where you will be able to view the full policy.

For any questions or notices, please contact our Privacy Officer at:

Central Lakes Trust

NZBN 9429043069224

Address: 190 Waenga Drive, Cromwell

Phone: 03 445 9958

Email: info@clt.net.nz

Document Control

#	Date Approved	Changes Made
1.	January 2022	Legal review completed by Legal Vision
2.	April 2022	Policy last noted as approved
3.	June 2023	Reviewed and updated