



# Independent Stevedoring Limited – Privacy Policy

## 1. Overview

Independent Stevedoring Limited (ISL) is required to comply with the New Zealand Privacy Principles (NZPP's) as set out in The Privacy Act 2020.

This policy sets out how ISL (“we/us”) collects, uses, stores, manages and discloses your personal information.

Additional information in relation to the NZPP's can be found on the website of the New Zealand Privacy Commissioner located at [www.privacy.org.nz](http://www.privacy.org.nz).

## 2. Scope & Application

This policy is applicable to all members of ISL. Personal information is provided to us in a number of different ways. For example, we may receive personal information as a result of your use of our website or by your use, or prospective use of, our services.

This policy will be reviewed periodically to ensure that it is keeping abreast with legislative requirements and current workplace practices. Your continued provision of personal information to us, including by way of use of our website, services or otherwise, constitutes your acceptance of this policy and any revision of the policy that is published on our website.

Notwithstanding this policy, we may rely on certain exemptions under privacy laws including in relation to employee records.

## 3. What is personal information?

Personal information means information or an opinion that can identify you as an individual, or from which your identity can reasonably be ascertained. It does not matter whether the information or opinion is true or not, or whether it is recorded in a material form.

## 4. What kind of personal information do we collect and hold?

The kind of personal information that we collect and hold will depend on our relationship with you.

Generally, the kind of information that we collect and hold includes the following:

- your contact details including your name, address, telephone number, date of birth, email address, gender, driver licence no., emergency contacts;
- information relating to your organisation and your title;
- your remuneration, bank account details and Inland Revenue number;
- information relating to your superannuation/kiwisaver affairs;
- your medical and health information including drug and alcohol testing conducted by our consultants/third parties;
- information about your qualifications, previous experience and screening checks (including but not limited to health, background, eligibility, criminal etc.);
- your union or professional/trade association memberships;
- information arising from the investigation of incidents and allegations of wrongdoing including witness statements,
- your image via CCTV footage where you have attended our premises;
- when you visit our website, the server address, domain name, date and time of your visit and pages visited in addition to any information directly provided by you; and
- location information from mobile devices supplied by us.

Some of the information that we collect and hold described above is classified as sensitive information. Sensitive information about you will not be collected unless we have received your consent and the information is reasonably necessary to allow us to undertake our business functions and activities.

## 5. How do we collect your personal information?

We endeavour to collect personal information from you directly. Where this is not reasonably practicable we may collect information about you from third parties, where we reasonably believe that you have consented to these sources collecting and disclosing the information. Such third parties may include:

- our contractors and service providers;
- publicly available sources;
- government agencies; and
- representative/s authorised by you.

Generally, information is collected by us verbally, by email, in writing, through our website and by the monitoring of our other business devices. We may operate video and audio surveillance devices in our premises (eg. CCTV)

Personal information is stored in our systems (and those of our services providers) both electronically and in paper form.

The security of your information is important to us and we take reasonable steps to protect it from misuse, unauthorised access, modification or disclosure. For example, we use electronic security systems including firewalls and encryption.

## 6. How do we use your personal information?

We collect, hold, use and disclose personal information that is reasonably necessary to allow our organisation to function and perform its activities or that we are otherwise permitted to collect, hold, use and disclose by law.

For example, we may use your information for the following purposes:

- to provide, administer and improve our products and services;
- to discuss our service offerings with you;
- verify your details;
- to maintain and update our records;
- to manage our relationship with you;
- to protect our lawful interests;
- in connection with suspected fraud, misconduct and unlawful activity under specific New Zealand legislation;
- in connection with acquisitions or potential acquisitions of our business;
- if you apply for a position, to assess your application and consider you for and contact you about other positions;
- to provide you with publications and invitations based on the areas of interest or mailing lists that you subscribe to (if any);
- to manage relationships with third parties;
- to gather information about our website visitor trends.

## 7. Will we disclose your information?

We may exchange your personal information with:

- our shareholders and board of directors;
- your representatives;
- contractors and service providers which assist us with, archival, auditing, accounting, customer contact, legal, business consulting, banking, payment, delivery, data processing, data analysis, information broking, recruitment providers, external communications, research, investigation, website and technology services;
- additional service providers including providers of payroll, banking, staff benefits, surveillance and training services;
- third party lenders and our insurers;
- government agencies as required by law;
- solicitors and other parties where we are subpoenaed to provide such information; and
- anyone authorised by you to whom personal information relates.

## 8. How can you access your personal information?

Subject to certain exceptions, we will provide access to your personal information, upon written request by you.

If you wish to access your personal information, please write to:

The Privacy Officer

Independent Stevedoring Limited

30 Mirrielees Road

Tauranga 3110

Email: [isl@independentstevedoring.co.nz](mailto:isl@independentstevedoring.co.nz)

Where we hold personal information that you are entitled to access we will provide you with a means of accessing it within a reasonable period from when we received your written request. We reserve the right to charge a reasonable fee in consideration of the resources required in order to provide you with access to your personal information.

We will provide you with a written notice of any refusal to give access to your personal information where you have made such a written request.

## 9. How can you correct your personal information?

Reasonable steps are taken to ensure that your personal information is accurate, complete and up to-date whenever we receive or use it.

If you consider that personal information that we hold about you is inaccurate, incorrect, out-of date, incomplete, irrelevant or misleading, you can write to us and request that we correct that personal information. Correspondence should be directed as set out in point 8 above.

If we do not agree that your personal information requires correction, we will write to you and inform you of the reasons why. In these circumstances you may ask that we note your views about what the correct information is.

## 10. What do you do if you have a complaint?

If you have any concerns about the way that we have handled your personal information or any request relating to your personal information, please lodge a complaint with our Privacy Officer using the contact details set out in clause 8. Please provide your name, contact number, email address and the details of your complaint (including supporting evidence (if any)).

We take complaints seriously and our Privacy Officer will investigate all complaints and will respond in writing within a reasonable time. Our Privacy Officer will inform you in writing about the outcome of the investigation.

If our Privacy Officer does not resolve your complaint to your satisfaction and no other complaint resolution procedures are agreed or required by law, your complaint may be referred to the Privacy Commissioner in New Zealand (as applicable) for further investigation.

## 11. Will your personal information be disclosed to overseas recipients?

Whilst we are principally based in New Zealand, our shareholders and some of our service providers have offices that are located overseas. We endeavour to ensure that any third parties who have access to personal information and are located overseas are aware of the requirements of the NZPP's and where possible, deal with that information in accordance with the NZPP's. Notwithstanding these steps, we cannot guarantee that personal information sent overseas will be subject to a similar level of protection as it is in New Zealand.

## 12. Direct Marketing Communications

We might send you direct marketing, communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms including mail and email in accordance with the relevant legislation. If you indicate a preference for a particular method of communication, we will endeavour to use that method where practical to do so. If you wish to opt-out of receiving marketing communication then please contact us using the details set out in point 8 above.