

PRIVACY POLICY

INTRODUCTION

F T Dooley Limited respects privacy and is committed to protecting personal information in compliance with the New Zealand Privacy Act 2020 (the **Act**). Personal information is information about an identifiable individual (a natural person).

This Privacy Policy applies to all personal information collected by us, or submitted to us, whether offline or online, including personal information collected or submitted through our website.

This Privacy Policy describes how we deal with information we collect and demonstrates our commitment to the protection of individual privacy. By providing personal information to us, you are accepting and consenting to the practices described in this Privacy Policy. If you do not agree with any of the terms of this Privacy Policy, please do not submit any personal information to us.

This policy does not limit or exclude any individual rights under the Act. If you wish to seek further information on the Act, see www.privacy.org.nz.

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.

This policy was last updated on 27 November 2020.

PERSONAL INFORMATION COLLECTED

Personal information is any information about an identifiable individual, such as your name or your contact information. Personal information might be provided to us by you or by others.

We will collect your personal information where you choose to provide it. The type of personal information we collect depends on the nature of our relationship with you.

We collect personal information about you in the following circumstances:

- ▲ We will collect the personal information necessary to provide the services we are engaged to provide. This may include individual names, contact details (such as an email address, telephone number, physical address), identification documents such as a copy of one's passport or driver's licence, tax file numbers or other government-issued identification numbers. To provide certain services, we might be required to collect further personal information from individuals to verify their identity. For example, where we are requested to provide a service that is a designated activity under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009. We will provide additional information where this applies to a specific engagement
- ▲ If we receive an enquiry or request for proposal through our website, we will collect data including names and email addresses so we can respond to the query or proposal

- ▲ If one is registered with us to receive ongoing updates about our services, events and/or for other marketing purposes we will collect personal information in the form of names and email addresses to provide these updates. We may also be provided with other contact details such as telephone numbers or physical addresses.

Where personal information is provided it is agreed to allow use of the information in accordance with this Privacy Policy.

We will generally collect information directly. In some instances, we might collect personal information from a third-party such as an employer or a personal representative or from publicly available sources.

HOW WE USE YOUR PERSONAL INFORMATION

We will not collect or use your personal information unless it is lawful to do so. We will use personal information:

- ▲ to verify identity
- ▲ to provide services
- ▲ to market our services and products, including electronic contacting (e.g. by text or email for this purpose)
- ▲ to improve the services and products that we provide
- ▲ to undertake credit checks (if necessary)
- ▲ to bill and to collect money that is owed to us, including authorising and processing credit card transactions
- ▲ to respond to communications, including a complaint
- ▲ to conduct research and statistical analysis (on an anonymised basis)
- ▲ to protect and/or enforce our legal rights and interests, including defending any claim
- ▲ for any other purpose authorised by individuals or the Act
- ▲ The provision of personal information is voluntary. However, if one cannot, or will not, provide us with the personal information we reasonably require, we may not be able to contact or otherwise interact, or provide some or all requested services

We have a legitimate interest in using information in these ways and it is fundamental to the nature of the service we provide.

In addition to the specific circumstances above, we will only use personal information with individual consent (if required under applicable data protection laws) when we send carefully selected marketing materials about our services (or updates related to them) by email. Individuals have the right to opt out of receiving such direct marketing at any time.

If at any time one wishes to stop receiving direct marketing messages from us, the easiest way to do so (for electronic messages) is to use the unsubscribe feature in the marketing message received.

Our website may contain hyperlinks to websites operated by third parties. We are not responsible for the content of such websites, or the way those websites handle any personal information provided to them by individuals. We have no control over, and are not responsible for, any third party's use or disclosure of personal information.

DISCLOSING YOUR PERSONAL INFORMATION

We do not use personal information or disclose it to another organisation unless:

- ▲ it is reasonably necessary for one of the purposes described above.

- ▲ having regard to the nature of the information or the circumstances of collection we believe one would expect us to use the information or make the disclosure.
- ▲ required or authorised by law or court or tribunal.
- ▲ it is necessary to protect the rights, property, health or personal safety of the public or our interests, and it is unreasonable or impracticable to obtain individual consent.
- ▲ the assets and operations of our business are transferred to another party as a going concern.
- ▲ it is necessary to obtain third party services, for example to carry out data analysis or provide information processing services (where use of individual information by third parties is strictly controlled).
- ▲ it is for one of the purposes expressly permitted under applicable data protection and privacy laws.
- ▲ Consent has been provided.

For avoidance of doubt, we may disclose personal information to:

- ▲ where applicable, third parties who provide related services or products in connection with our business such as software providers, support services, and any party assisting us in carrying out the purposes described above.
- ▲ any agent, contractor or service provider who provides administrative, credit reference, debt collecting or other services necessary to the operation of our business.
- ▲ government agencies, statutory authorities and industry regulators.
- ▲ our sub-contractors or third-party service or product providers as may be determined to be necessary or appropriate.

To suppress or limit our use of personal information that has been previously provided to us, please email, call or write to us using the contact information listed below in the "Contacting us" section.

We will not sell personal information to third parties.

PROTECTING YOUR PERSONAL INFORMATION

F T Dooley Limited has security policies and procedures in place to protect personal information from loss, unauthorised access, use, modification, disclosure or misuse. Despite F T Dooley Limited's best efforts, security cannot be guaranteed against all threats. To the best of our ability, access to personal information is limited to those who need to know. Those individuals who have access to the data are required to maintain the confidentiality of the information.

We also make reasonable efforts to retain personal information only for

- ▲ so long as the information is necessary to comply with an individual's request; or
- ▲ as necessary to comply with legal, regulatory, internal business and policy requirements.

The period for which the information is retained will depend on the specific nature and circumstances under which the information was collected.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

Subject to certain grounds for refusal set out in the Act, individuals have the right to access readily retrievable personal information that we hold and to request a correction to that information. Before this right is exercised, we will need evidence to confirm the identity of the individual to whom the personal information relates.

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 a correction has been requested.

If an individual wants to exercise either of the above rights, they should email us at info@ftdooley.co.nz. The email should provide evidence of identity and set out the details of the request (e.g. the personal information, or the correction, that is being requested).

We may charge a reasonable fee to provide copies of personal information or correcting that information.

INTERNET USE

While we take reasonable steps to maintain secure internet connections, if we are provided with personal information over the internet, the provision of that information is at the individuals own risk.

If a link on our website to another site is followed the owner of that site will have its own privacy policy relating to personal information. We suggest a review of that site's privacy policy before personal information is provided.

CONTACTING US

If one has any questions about this privacy policy, our privacy practices, or if an individual would like to request access to, or correction of, personal information, we can be contacted at:

**24 Wakefield Street
WESTPORT**

**PO Box 244
WESTPORT 7866**

info@ftdooley.co.nz

Phone: 03 789 7389