

COMPANY POLICY

Privacy

Not to be released outside of the company without permission of the Company Directors. Once printed this is no longer a controlled document.

SCL.DOC33.V01 – REVISION DUE: 01 SEP 23

1 PURPOSE

At “(Skevington Contracting Limited) T/A (Skevingtons)” we are committed to continuous improvement and have established a Quality Health Safety and Environmental Management System (QHSE MS) which provides a framework for measuring and improving our performance.

As part of that framework Skevingtons is committed to protecting your privacy. This privacy statement outlines how we collect, handle, store, use and share your personal information.

2 SCOPE

This procedure applies to all workers and visitors at/on Skevingtons worksites/places of work. This procedure applies while in the workplace or on company premises, whenever conducting business and representing Skevingtons. Skevingtons policies and procedures will be communicated to all employees and available in the company’s cloud based QHSE Management System “Mango” document library and to the public on the company’s main office safety notice board.

3 ACCOUNTABILITIES

Company:

The Company recognises the need to have proper regard in all its activities for the environments in which it operates. When undertaking activities, the company is committed to the following principles in the day-to-day operation of the business and ensuring adequate resources are allocated for doing so.

- Responsible for implementing this policy and to comply with all the legal obligations of the jurisdictions in which we operate.
- Setting and reviewing Quality Management objectives and targets through our Plan, Do, Act, Check cycle process, to assist in continuous improvement opportunities and, undertaking regular audits and inspections to ensure standards are being adhered to.
- Provide our workers with all necessary training, education, equipment, and information to promote and improve performance associated with our business activities.
- Endeavouring to reduce the use of resources and waste through innovative technology/ engineering options and recycling practices.
- Working in partnership with our stakeholders, such as local communities, conservation groups and traditional owners.
- Ensuring that requirements for quality management are communicated and clearly understood by all employees and contractors.
- Take appropriate action in respect of any breach of this policy when required.

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Management, Supervisors, and Team Leaders

Managers, Supervisors and Team Leaders bear responsibility for the effective implementation of this policy in all of the areas under their direct control and for ensuring that it is applied equitably and consistently to all individuals.

- To comply with this privacy policy as well as other standards and procedures relevant to the work environment.
- Observe and support good quality management practises within our organisation. Taking prompt and appropriate action in respect of any breach or suspected breach of this policy.
- Ensure all workers are aware of their responsibilities. Communicating operational requirements to employees before and during operation.
- Ensure all relevant requirements are documented, e.g., resource consents, prescriptions, company standards, management policies and best management practices.
- Comply with all relevant legislation, resource consent conditions, historic places authority conditions, regional and district plan rules.
- Carry out and document (as required by Skevingtons), ongoing monitoring of requirements.
- Notify the Privacy Officer in respect of any breach of this policy.

All Employees, Contractors.

To comply with this privacy policy as well as other standards, legislation and procedures relevant to the work environment.

- Notify the Privacy Officer in respect of any breach of this policy.

Visitors (e.g., clients/customers or guests)

On entering the workplace visitors of the Company are responsible for:

- Complying with Company Policy, Protocol and Procedures
- Acting in a responsible manner so as not to endanger themselves or others or create offence to others through their behaviour or conduct.
- Notify the Privacy Officer in respect of any breach of this policy.

4 PRIVACY STATEMENT

By supplying us your details, you consent to the use of your Personal Information in accordance with this privacy statement. Personal Information is collected or processed based on consent; however, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conduct prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

4.1 What Information Do We Collect?

We may collect personal information about you, either directly from you or from other parties and we may generate information about you when we carry out our business.

The types of Personal Information we collect about you may include your:

- Contact information: your name, phone number, email address, postal address, physical address;
- Documents that verify your identity and other personal details: such as your passport or drivers' licence number;
- Subscriptions/preferences: when you subscribe to receive our newsletter or updates, as well as content preferences to help us identify which material you want to receive;
- Billing or purchase information; and
- Technical information: information about the device used to access the website or other social media sites, such as IP address, browser type, time zone settings and mobile network information.

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4.2 What Do We Do with the Information We Collect?

We collect and use your Personal Information to provide the information and services that you request from us, and to provide you with information about other services we consider appropriate.

When necessary, we may use your information to:

- Any purpose which we notify you about when we collect your information or to which you have provided your consent;
- Comply with our legal and regulatory obligations (including Anti Money Laundering/Counter Financing of Terrorism compliance and audit and reporting requirements);
- Considering and assessing your application for supply of our products or services;
- Protecting our interests, including by registering a security interest on the Personal Property Securities Register or checking against sanctions or other reference lists;
- Responding to your enquiries, concerns, or complaints;
- Defend or enforce our rights - for example, to collect money owed to us; and
- Publish (including by posting on social media) customer testimonials/video testimonials which may contain personally identifiable information. We will obtain the customer's consent prior to publishing the testimonial along with their name.

4.3 Who Do We Share Your Information With?

Besides our staff and our associated companies, we may share this information with third parties who enable us to provide you with our services. These include:

- Your other professional advisers
- Product providers
- Our service outsources providers such as IT consultants, subcontractors, etc.
- We will only share your Personal Information with third parties where it is necessary to help us do what we collected your information for, where it is required by law or where you give us authority to.

We require these third parties to adhere to our strict confidentiality requirements for handling Personal Information and we seek to ensure that they comply with the Privacy Act 2020.

4.4 Where Do We Store It?

Personal information we collect is stored and processed for use, by way of hard drives, external drives and third-party cloud service providers. We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

4.5 Disclosing your Information Overseas

We may disclose your information to organisations located overseas. These include:

- Our related companies elsewhere in the world.
- In addition, individuals who are residents of the European Economic Area "EEA" can object to processing of their Personal information, ask to restrict processing of their Personal Information or request portability of their Personal Information. You can exercise these rights by contacting us using our contact details provided below.
- The right to complain to a data protection authority about the collection and use of Personal Information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the EEA (if applicable) are available at: ec.europa.eu/justice

Any information we share overseas will be subject to comparable safeguards to those under the Privacy Act 2020.

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4.6 Direct Marketing

We may send you direct marketing to inform you about products or services, special offers, promotions, and events that may be of interest to you. These marketing communications may include joint promotions with other promotion partners and may be sent to you using any contact details provided by you, such as post, phone, email, or SMS.

If you do not wish to receive marketing communications and surveys from us or third-party partners, you can let that organisation know at any time using the contact details in their respective privacy policies or utilising the “unsubscribe” or other opt-out function offered by us or other the organisation.

In some circumstances we may need to contact you to obtain additional information, verify your identity or to clarify your request, to action it.

Your consent to receive direct marketing communications from us in the above ways will be deemed if you do not opt out when you are offered the opportunity to do so and will remain current on an ongoing basis unless and until you advise otherwise.

If the law requires us to provide you with information about our products or services (i.e., product recalls), we will provide that information even if you have elected not to receive information about our products and services generally.

4.7 Accessing and Correcting Your Information

You can generally access and request the correction of information we hold about you by contacting us in any of the ways set out at the bottom of this policy.

Notwithstanding, access to your Personal Information may be refused on some occasions, such as where the information relates to anticipated legal proceedings or if the request for access is frivolous or vexatious. If we deny or restrict your access, we will write to you to let you know why, unless, having regard to the grounds for the refusal, it would be unreasonable for us to do so. You may make a complaint about a refusal to the Office of the Privacy Commissioner at: www.privacy.org.nz

We rely on the information that we hold about you to provide our products and services to you, and to perform our business functions. Therefore, it is very important that the information we hold is accurate, complete, up to date and relevant for its intended use. This means that, from time to time, we may ask you if your information is still accurate and up to date. If you find that any information that we hold about you is incorrect, you should contact us immediately and we will take reasonable steps to correct it.

4.8 Contacting Us:

You can contact Skevington Contracting Limited by:

Privacy Officer: Adrian Hollamby

Email: hands@skevingtons.co.nz

Telephone: 03 4651880

Address: 121 Tiverton St, Palmerston, 9430

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5 PRIVACY POLICY FOR CUSTOMERS

We know that how we collect, use, disclose and protect your information is important to you, and we value your trust. That is why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

The purpose of this Privacy Policy is to inform our customers and any users of our digital platforms (i.e., our website and social media pages) about how we comply with the requirements of the New Zealand Privacy Act 2020 (“the Privacy Act”) in managing personal information.

5.1 Consent to Privacy Policy

Please note that when you contact us through our website, [social media pages or our app,] you are agreeing to this Privacy Policy. If you do not agree with this Privacy Policy, please do not contact us through any of our digital platforms but call us on 034651880.

5.2 Collection of Personal Information

Personal Information is defined in the Privacy Act as information about an identifiable individual (a natural person as opposed to a company or other legal entity).

5.2.1 Types of personal information we collect

The types of personal information we collect will vary depending on the nature of your dealings with us. We only collect personal information that is necessary. Where reasonable and practicable, we will collect your personal information directly from you and inform you that we are collecting it.

We mainly collect personal information directly from you, for example:

- Over the telephone or a video call (such as over Microsoft Teams, Zoom or Skype) e.g., when you contact our staff; and
- Through one of our digital platforms like our website, [social media pages and app (including through any online chat, virtual assistant, or bots)]

When you email or write to us; or when you participate in a marketing campaign, competition, or promotion (or a similar event) administered by us or our representatives.

If it is not obvious that we are collecting personal information from you, we will do our best to make it clear to you so that you are always aware when information is being collected.

Generally, the types of personal information we collect, and hold include your:

- Name
- Date of birth
- Contact details (such as your email address, postal address, phone number)
- Details relating to your use of any product and/or service offered by us
- Details of your enquiry
- Details of any preferences you tell us about (such as subscription preferences).

We may also collect personal information about you from:

- Publicly available sources e.g., via the internet
- Your professional organisation e.g., Master builders

We collect your personal information from the above parties (other than publicly available sources) where we have received your express consent to do so.

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We are not responsible for the privacy or security practices of the above parties and the parties described above are not covered by this Privacy Policy.

5.2.2 Online device information and cookies

If you are visiting us through our website, [social media pages or app], then we collect information about your use and experience on these by using cookies. Cookies are small pieces of information stored on your hard drive or on your mobile browser. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

The cookies we send to your computer, mobile phone or other device cannot read your hard drive, obtain any information from your browser, or command your device to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Skevington Contracting Limited website.

When you interact with us through our website, [social media pages or app,] the information collected through the cookies may include:

- The date and time of visits
- Website page (or pages) viewed
- The website [or app] from which you accessed the internet and our website or other digital platform
- How you navigate through the website and interact with pages, including any fields completed in forms and applications completed (where applicable)
- Information about your location
- Information about the device used to visit our digital platform; and
- IP address (or addresses), and the type of web browser used

We will not ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us through a private message, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions, but we would require your express consent prior to us including you in such activities.

5.3 Purpose of Collection and Use of Personal Information

Any personal information you provide to us may be used to:

- Check whether you are eligible for the product or service offered by us
- Facilitate those services
- Provide information that you request; and / or
- Provide you with further information about our other products and services.

We also have an obligation to maintain personal information to disclose to regulatory and similar bodies - see "Disclosure of your personal information" below. These bodies have a legal right to such information.

5.4 Storage and Protection of Your Personal Information

We may electronically record and store personal information which we collect from you. When we do so, we will take all reasonable steps to keep it secure and prevent unauthorised disclosure. However, we cannot promise that your personal information will not be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur. If we provide you with any passwords or other security devices, it is important that you keep these confidential and do not allow them to be used by any other person. You should notify us immediately if the security of your password or security device is breached, this will help prevent the unauthorised disclosure of your personal information.

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Some information we hold about you will be stored in paper files, but most of your information will be stored electronically on physical hard drives and/or on the cloud, by cloud service providers – see “Cloud-based service providers” below.

We use a range of physical and electronic security measures to protect the security of the personal information we hold, including:

- Access to information systems is controlled through identity and access management
- Our buildings are secured with a combination of locks, monitored alarms and cameras to prevent unauthorised access
- Employees are bound by internal information security policies and are required to keep information secure
- Employees are required to complete training about information security and privacy

When we send information overseas or use service providers to process or store information, we put arrangements in place to protect your information.

- We regularly monitor and review our compliance (and our service providers’ compliance) with internal policies and industry best practice.
- We only keep information for as long as we need it, or as long as the law requires us to. We have a records management policy that governs how we manage our information and records to make sure we destroy any information that is outdated, irrelevant or unnecessary.

5.5 Cloud-Based Service Providers

We use third party service providers to store and process most of the information we collect. We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

5.6 Timeframes for Keeping Personal Information

We take reasonable steps to destroy or permanently de-identify any personal information as soon as practicable after the date of which it has no legal or regulatory purpose, or we have no legitimate business purpose with it.

In the case of information that relates to our products or services we have provided; we are required by law to hold this information for seven years. After this time, provided that the personal information is no longer relevant to any service we are providing you, we will take reasonable steps to safely destroy or de-identify any personal information.

We have a records management policy that governs how we manage our information and records to enable us to destroy any information that is outdated, irrelevant or no longer necessary.

5.7 If There Is A Privacy Breach

We work hard to keep your personal information safe. However, despite applying strict security measures and following industry standards to protect your personal information, there is still a possibility that our security could be breached.

If we experience a privacy breach, where there is a loss or unauthorised access or disclosure of your personal information that is likely to cause you serious harm, we will, as soon as we become aware of the breach:

- Seek to quickly identify and secure the breach to prevent any further breaches and reduce the harm caused;
- Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals;
- Advise and involve the appropriate authorities where criminal activity is suspected;
- Where appropriate, notify any individuals who are affected by the breach (where possible, directly);

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- Where appropriate, put a notice on our website advising our customers of the breach; and
- Notify the Privacy Commissioner.

5.8 Disclosure of Your Personal Information

We may disclose your personal information to others outside Skevington Contracting Limited where:

- It is necessary to enable us to achieve the purpose that we collected the information for;
- We are required or authorised by law or where we have a public duty to do so;
- You have expressly consented to the disclosure or your consent can be reasonably inferred from the circumstances; or
- We are permitted to disclose the information under the Privacy Act 2020.

5.9 Parties We May Disclose Your Information To

Your personal information may be used by us for the purpose of providing advice and services to you and may also be used by agencies such as, but not limited to:

- Any out-sourced service provider who assists in the services we are required to carry out such as auditors and external compliance reviewers
- Our external dispute resolution service
- The Regulator
- Credit reporting and debt collecting organisations

If we do not need to share your information with a third party in order to provide advice and services to you, we will not pass on your information to them without your consent. Under no circumstances will we sell or receive payment for disclosing your personal information.

5.10 Sending Your Information Overseas

We may send your personal information outside New Zealand, including to overseas members of Skevington Contracting Limited related companies and overseas service providers or other third parties who process or store our information, or provide certain services to us.

Where we do this, it does not change any of our commitments to you to safeguard your privacy.

We make sure that appropriate security and information handling arrangements are in place and the information remains subject to confidentiality obligations.

All countries have different privacy laws and information protection standards. If we need to send your personal information to a country that has lower standards of information protection than in New Zealand, we will take appropriate measures to protect your personal information. Where it is not possible to ensure that appropriate security and information handling arrangements are in place, we will let you know and gain your consent prior to sending your personal information overseas.

5.11 Third Party Websites

Through our website or our other social media pages, you may be able to link to other websites which are not under our control. We are not responsible for the privacy or security practices of those third-party websites and the sites are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies and we encourage you to read them.

In addition, we have no knowledge of (or control over) the nature, content, and availability of those websites. We do not sponsor, recommend, or endorse anything contained on these linked websites. We do not accept any liability of any description for any loss suffered by you by relying on anything contained or not contained on these linked websites.

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5.12 Right to Access, Correct and Delete Personal Information

You have the right to request access to, correct and, in some circumstances, delete your personal information.

You can do so by contacting us at:

Adrian Hollamby

Skevington Contracting Limited

121 Tiverton St

Palmerston 9430

Or via email at hands@skevingtons.co.nz

When you contact us with such a request, we will take steps to update or delete your personal information, provide you with access to your personal information and/or otherwise address your query within a reasonable period after we receive your request. To protect the security of your personal information, you may be required to provide identification before we update or provide you with access to your personal information.

We are only able to delete your personal information to the extent that it is not required to be held by us to satisfy any legal, regulatory, or similar requirements.

There is no fee for requesting that your personal information is corrected or deleted or for us to make corrections or deletions. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access or to correct or delete your personal information, we will let you know our reasons, except if the law prevents us from doing so.

If we refuse your request to correct or delete your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access, correct or delete your personal information, we will also provide you with information on how you can complain about the refusal.

5.13 What Happens If You Do Not Provide Us Your Information?

If you do not provide information we have requested, you may be unable to obtain or access our services for which the information is required. Please ask us if you are unsure what information is important and how this might affect you.

5.14 Changes to This Privacy Policy

We review this Privacy Policy periodically to keep it current a link is available on our website. If the changes are significant, we may advise you directly. You may also obtain a copy of the latest version by calling us on 034651880.

5.15 Privacy Policy Queries and Concerns

If you are concerned about how your personal information is being handled or if you feel that we have compromised your privacy in some way, please contact us at:

Skevington Contracting Limited

121 Tiverton St

Palmerston 9430

Adrian Hollamby

Phone: 03 4651880

Email: hands@skevingtons.co.nz

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We will acknowledge your complaint within three working days of its receipt.

We will let you know if we need any further information from you to investigate your complaint.

We aim to resolve complaints as quickly as possible.

We strive to resolve complaints within five working days, but some complaints take longer to resolve.

If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are not satisfied with our response to any privacy related concern you may lodge a complaint on the Privacy Office website (www.privacy.org.nz) or send a complaint form to the Privacy Commissioner at:

Office of the Privacy Commissioner
P O Box 10-094
Wellington 6143, New Zealand

Fax: 04- 474 7595

Email: enquiries@privacy.org.nz

Telephone: 0800 803 909

Website: www.privacy.org.nz

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6 Privacy Policy for Employees and Contractors

6.1 Skevington Contracting Limited Privacy Policy for Employees / Contractors

How we collect, use, disclose, and protect personal information is important to our business. We all have a part to play ensuring we comply with our privacy obligations in relation to the use and protection of personal information and our goal to be completely transparent about what we do with personal information.

Under the Privacy Act, there are 13 Information Privacy Principles (IPPs) our business must comply with. These are detailed in the appendices of this manual.

When collecting, using, and disclosing, and protecting personal information of any description, we must do so in accordance with the Information Privacy Principles (for IPPs see appendix).

The IPPs can be summarised as follows:

1. Only collect information the business needs.
2. Wherever possible, get the personal information directly from the individual.
3. Be transparent about what you are going to do with the personal information.
4. Be fair about how you get it.
5. Keep personal information secure.
6. Enable personal information to be accessed by the person it relates to.
7. Enable personal information to be corrected if it is incorrect.
8. Ensure personal information is correct before you use it.
9. Dispose of personal information securely once you no longer need it.
10. Only use personal information for the reason it was collected.
11. Only share personal information if you have a good reason.
12. Only send it overseas if it will be adequately protected.
13. Only use unique identifiers when it is clearly allowed.

This Privacy Policy sets out how our business collects, uses, discloses and protects the personal information we deal with in a way that complies with the Privacy Act 2020. The Employee/ Contractor Privacy Statement sets out how we collect and use the personal information of our employees and contractors.

6.2 Failure to Comply with This Privacy Policy

All employees and contractors should be aware that a failure to comply with this Privacy Policy, including any policies, processes and controls which are put in place under it, will be investigated and may lead to disciplinary action being taken.

6.3 Procedure

6.3.1 Collecting personal information

Personal information is defined in the Privacy Act 2020 as information about an identifiable individual (a natural person as opposed to a company or other legal entity).

6.3.2 Types of personal information we collect

Our business collects personal information from:

- Employees;
- Prospective employees;
- Contractors;
- Authorised bodies;
- Outsource providers;
- Customers; and
- Prospective customers.

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We only collect information we need. Where practical, we collect personal information directly from the source e.g., directly from the employee. We only keep personal information for as long as it is necessary. The amount of time that we hold the personal information for varies, depending on the nature of the personal information

All employees receive training to enable them to understand how the Privacy Act impacts on how we provide our services to customers and manage our business. Employees also receive training on the IPPs, how they impact the process of collecting information, and the ways in which they can and cannot collect personal information in their roles.

6.4 Storage and Protection of Personal Information

We only keep personal information for as long as it is necessary. The amount of time that we hold the personal information for varies, depending on the nature of the personal information. Our records are systematically checked to ensure that personal information is only kept while there is a lawful or legitimate business purpose.

Most of the data we collect through our business (including most personal information we collect) is stored electronically. We take all reasonable steps to keep it secure and prevent unauthorised disclosure. Employees and contractors also play an important role in keeping the information safe. All our employees and contractors are required to adhere to Skevington Contracting Limited policies, processes, and controls to help meet our Privacy Act 2020 obligations. This includes keeping passwords and devices secure, adhering to email and internet usage guidelines and being subject to employee monitoring, as set out in our IT and cybersecurity policies.

6.5 Privacy and Remote Working (Working from Home)

Remote working introduces additional risks in relation to potential breaches of privacy. We take all reasonable steps to ensure personal information is protected in these circumstances, including:

Requiring a trusted Wi-Fi network to be used (e.g., home Wi-Fi).

- Having multifactor authentication enabled
- Locking out a user after numerous failed logins
- Ensuring staff can only access information they need
- Storing devices in a safe location
- Ensuring work conversations are not overheard by other members of the household
- Locking devices when they are not in use
- Increased vigilance of unexpected emails

6.6 If There Is A Privacy Breach

We work hard to keep all personal information safe. However, despite applying strict security measures and following industry standards to protect personal information, there is still a possibility that our security could be breached. If you are aware of a privacy breach, where there is a loss or unauthorised access or disclosure of personal information, whether or not you think it is likely to cause serious harm, you must notify the Privacy Officer as soon as you become aware of the breach. This will allow us to:

- Seek to quickly identify and secure the breach to prevent any further breaches and reduce the harm caused by the breach;
- Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals;
- Advise and involve the appropriate authorities where criminal activity is suspected;
- Where appropriate, notify any individuals who are affected by the breach (where possible, directly);
- Where appropriate, put a notice on our website advising our customers of the breach; and
- Notify the Privacy Commissioner.

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All employees receive training to enable them to identify a privacy breach, how to reduce the risk of a privacy breach occurring and how to respond to a privacy breach if one does occur.

We maintain a Near Miss/Breach Register to record all privacy breaches that occur in our business, whether or not they pose a risk of serious harm or require us to notify any external parties. It is important that you notify the Privacy Officer as soon as you become aware of any privacy breach, so that the breach can be logged on the Near miss/Breaches Register, and any necessary further action can be considered.

6.7 Disclosure of Personal Information

We only disclose personal information to others outside Skevington Contracting Limited where:

- It is necessary to enable us to achieve the purpose that we collected the information for;
- We are required or authorised by law or where we have a public duty to do so;
- We have received express consent for the disclosure from the person the information relates to, or consent can be reasonably inferred from the circumstances; or
- We are permitted to disclose the information under the Privacy Act 2020.

Please contact the Privacy Officer if you are not sure whether you are permitted to disclose personal information either internally or externally.

We have legal obligations to maintain personal information to disclose to regulatory and similar bodies. Before entering into an agreement with an outsourcing provider or other third party, we undertake due diligence checks of the third party. All agreements that are entered into with third parties include provisions to ensure personal information is dealt with as required by the Privacy Act 2020.

6.8 Sending Personal Information Out of New Zealand

We may send personal information outside New Zealand, including to overseas members of Skevington Contracting Limited related companies and overseas service providers or other third parties who process or store our information or provide certain services to the business.

Where we do this, it does not change any of our commitments to safeguard privacy. We must make sure that appropriate security and information handling arrangements are in place and the information remains subject to confidentiality obligations.

All employees receive training about their Privacy Act 2020 obligations when sending personal information overseas and also our business' policy on when this may be done and the processes that must be followed before the information is sent.

All countries have different privacy laws and information protection standards. If we need to send personal information outside of New Zealand, our Privacy Officer will undertake due diligence to confirm this is permitted. You can gain guidance from the Privacy Officer if you are unsure about whether you can send personal information outside of New Zealand.

6.9 Accessing and Correcting Personal Information

Every person has a right to access personal information that is held about them and ask for it to be corrected if they think it is wrong. Our business has a legal duty to respond to requests for access to information or correction of that information within 20 working days of receiving the request, although our policy is to respond to the request as soon as possible.

If an employee or contractor receives a request from a person who wants to access the personal information the business holds about them, or make a correction to it, they need to send all the details of the request, along with the individual's contact details to the Privacy Officer as soon as possible after receiving it. The Privacy Officer will then follow the process set out below.

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Before processing the request, the Privacy Officer may contact the relevant individual to verify their identity, confirm the request and advise the individual of any charges that apply. The Privacy Officer will then take steps to provide the individual with access to their information, take steps to update or change the requested information, or otherwise address the query within a reasonable period after the request is received.

There are some circumstances in which our business is not required to give an individual access to their personal information or correct it upon their request. If one of these circumstances applies, the Privacy Officer will let the individual know the reasons for the refusal, unless the law prevents them from doing so. If a request to correct or delete personal information is refused, the individual has the right to request that a statement be associated with their personal information, noting that they disagree with its accuracy. We are only able to delete or remove an individual's personal information from our records if we are not required to hold the information to satisfy any legal, regulatory, or similar requirements. If the Privacy Officer refuses a request to access, correct or delete personal information, the individual will be provided with information about how they can make a complaint about the refusal.

6.11 Complaints

We have a strict timeframe for responding to any privacy related complaints received by our business. Our policy is to acknowledge all complaints within three working days of their receipt, and we aim to resolve complaints within five working days, but some take longer to resolve.

If an employee or contractor receives a privacy related complaint, they must contact the Privacy Officer and send them all relevant details of the complaint as soon as possible. The Privacy Officer will then contact the individual to acknowledge the complaint and work to resolve the complaint as quickly as possible.

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7 Employee/Contractor Privacy Statement

Skevington Contracting Limited (“the Company”) collects and processes personal information relating to its employees and contractors to manage its working relationships with those people. This personal information may be held in paper and/or electronic format.

The Company is committed to:

- being transparent about how it handles your personal information;
- protecting the privacy and security of your personal information; and
- meeting its obligations under the Privacy Act 2020.

This Employer/Contractor Privacy Statement applies to all current and former employees and contractors that have worked with us since 1993. This statement does not form part of any contract of employment or authorised body agreement or contractor agreement.

The Company has appointed a Privacy Officer to oversee its compliance with the Privacy Act 2020. If you have any questions about this Employer/Contractor Privacy Statement or about how we handle your personal information, please contact:

Adrian Hollamby
Phone: 03 4651880
Email: hands@skevingtons.co.nz

The Company is responsible for and must be able to demonstrate compliance with the Information Privacy Principles (IPPs).

7.1 The Types of Personal Information We Collect About You

Personal information is any information about an individual from which that person can be directly or indirectly identified. The Company collects and uses a range of personal information about you, including but not limited to:

- Your contact details
- Your emergency contact details/next of kin
- Medical conditions/medication/s
- Your date of birth
- Your gender
- Your marital status and dependants
- The start and end date of your employment
- Recruitment records
- Your salary
- Your IRD number
- Bank account details, payroll records, tax details
- Disciplinary records
- Leave records, including holiday and sickness details
- Information about your use of IT systems
- Worker ethnicity
- Any other relevant information that maybe require to fulfil you role within Skevingtons

7.2 How We Collect Your Personal Information

The Company may collect personal information about employees and contractors in a variety of ways. It is collected during the recruitment process, either directly from you or sometimes from a third party, such as a recruitment agency. We may also collect personal information from other third parties, such as references from former employers, information from credit reference agencies and criminal record checks.

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7.3 Using and Disclosing Your Personal Information

We will only use your personal information when the law allows us to. We will use your personal information in one or more of the following circumstances so:

- we can perform the employment or contractor agreement we have entered into with you.
- we can comply with our legal obligations.

The purpose for which we are using your personal information is to:

- Enable us to maintain accurate and up to date employee and contractor records and contact details
- Run recruitment processes and assess your suitability for employment, engagement or promotion
- Comply with our legal and regulatory obligations
- Administer the contract we have entered into with you
- Ensure you are paid correctly
- Ensure compliance with tax requirements
- Operate and maintain a performance management system
- Record and assess your education, training and development needs
- Plan for career development and succession
- Manage, plan and organise work
- Enable effective workforce management
- Operate and maintain leave procedures, including annual leave, sick leave, maternity leave etc.
- Ascertain your fitness to work
- Meet our obligations under health and safety legislation
- Monitor use of our IT procedures to ensure compliance with IT related policies
- Ensure network security and prevent unauthorised access to systems
- Ensure effective HR processes
- Ensure adherence to Company policies and procedures
- Obtain insurance (e.g., professional indemnity insurance)

7.4 What If You Fail to Provide Personal Information?

If you fail to provide certain personal information when required, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your legal or contractual rights.

7.5 Change of Purpose

We will only use your personal information for the purpose for which it was collected. If we need to use your personal information for a purpose other than for which it was collected, we will provide you with information about the new purpose and any additional relevant information prior to using your personal information in a new way. This will give you the opportunity to revoke your consent to the new use.

7.6 Access to Your Personal Information

Your personal information may be shared internally within the Company, including with members of the HR department, payroll staff, your line manager, other managers, and IT staff, if access to your personal information is necessary for them to perform their roles.

The Company may also share your personal information with third parties and/or outsource providers (and their designated agents), including:

- Recruitment agencies for the purpose of conducting pre-employment checks
- Medical and health checks
- Payroll providers
- KiwiSaver providers
- IT services

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- Ministry of Social development for the Covid 19 wage subsidy

The Company may also share your information in the context of a potential sale or restructuring of the business. In those circumstances your personal information will be subject to an agreement of confidentiality.

7.7 Protecting Your Personal Information

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls to try and prevent your personal information from being accidentally lost, destroyed, altered or disclosed, or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, contractors and third parties who need to access your personal information in order to perform their work duties and responsibilities. You can obtain further information from the Privacy Officer.

It is important that the personal information we hold about you is accurate. Please keep us informed if your personal circumstances change, e.g., you change your home address or phone number.

You have the right to:

- Request access to your personal information
- Request correction of your personal information

If you wish to access your personal information or make any correction, please contact the Privacy Officer.

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On behalf of and for the use of and Skevington Contracting Limited.

8 BREACH OF POLICY

A breach of this policy will be treated as a disciplinary matter and may lead to disciplinary action up to and including dismissal.

Reference/Compliance Information and Key Terms/Definitions used in this policy are documented in Skevingtons Quality, Health, Safety and Environmental Management System.

Managing Director:		Date:	17.10.22
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COMPANY POLICY

PRIVACY

I (*print name*)

Acknowledge that I have read and understand the above policy and agree to the terms and conditions as stipulated.

Signature:		Date:	
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