

## PRIVACY POLICY

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At Community Trust South we are committed to ensuring the privacy of your Personal Information. We don't collect a large amount of Personal Information about you but if we do, we treat it with care and respect.

This Privacy Policy (Policy) lets you know what Personal Information we collect and how we use, store, and share that Personal Information in compliance with the Privacy Act 2020.

Please read this Privacy Policy before using our Site, engaging with us or otherwise providing us with your Personal Information. By using this Site or otherwise engaging with us, you agree to be bound by the terms of this Privacy Policy.

### Terminology

In this Policy, the terms “we”, “us”, and “our” refer to Community Trust South, and the terms “you” and “your” refer to you as the person using our Site, or otherwise engaging with us, and providing us your Personal Information.

“Personal Information” means information about an identifiable individual.

“Act” means Privacy Act 2020.

“Site” means the Community Trust South website.

“AMLCFT” means Anti-Money Laundering and Countering Financing of Terrorism.

“Funding” means Grants, Scholarships, Community Loans and any other financing opportunities we may offer.

### Application of this Policy

This Policy applies to any Personal Information that we collect when you interact with us, including when you:

1. visit our Site or use any of our other online services;
  2. visit any of our offices;
  3. apply for, or receive Funding;
  4. provide us with information for us to meet our AMLCFT requirements;
  5. register to receive marketing communication from us;
  6. use any other services we provide now or in the future.
- (together the “Services”).

In the event of any inconsistency between this Policy, and any of our other policies or terms and conditions that may apply to your use of our Services, the terms of this Policy will prevail.

### Our Terms of Use

This Policy is part of the Terms and Conditions of Use of this Site. Our Terms and Conditions of Use can be accessed through the link provided at the bottom of every page of the Site.

### Collection of Personal Information

We collect Personal Information directly from you wherever possible, for example when you

contact us by email or via our Site, or when you apply for Funding.

We (and any authorised third party) may also collect Personal Information:

1. as part of our recruitment process;
2. when you are employed by us;
3. when you are appointed as a Trustee;
4. when you apply for Funding (such as information from referees);
5. through the use of cookies and use of monitoring software or google analytics when you use the Site;
6. when you subscribe to receive direct marketing communication from us;
7. when you complete forms on this Site or engage with any of our other online services;
8. when you register to receive direct marketing from us.

The Personal Information we collect may include: your name, email address, mailing address, phone number, user name, date of birth, contact preferences, online activity logs related to our website, IP addresses, cookie, device, browser and operating system identifiers, internet tags, location and navigational data provided by your connection, server addresses, top-level domain names, dates and times of visits to the website, pages accessed and documents downloaded, interactions with tools and advertising, previous websites visited, and the type of browser used.

### **Use of Cookies**

We use cookies to collect information about how you access this Site and by using this Site you confirm you agree to the use of cookies.

A cookie is a small text file placed on your browser by a website you visit. They help users to navigate websites efficiently, perform certain functions on websites and/or to provide website owners, such as us, with information about how sites are used. We use different types of cookies for different purposes on our Site to enhance functionality and to improve the performance of our Site so we can provide you with a better experience.

By using our Site, you consent to the storage and accessing of cookies or other information on your device in connection with your use of the Site.

Most web browsers allow you to set some control over cookies. You can change your cookie preferences in your browser settings including deleting them from your browser or disabling them altogether or you can refuse to accept cookies when you visit a website. If you do choose to set your browser to disable all cookies, this may affect your ability to use some features on our Site.

To learn more about cookies and how you can manage them in your web browser, visit:

[www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.aboutcookies.org](http://www.aboutcookies.org)

### **Web analytics**

We use Google analytics cookies to help us analyse how you interact with our Site and its content. We collect non identifiable web traffic data (i.e. IP address, your computer platform, the browser you use and the domain you are accessing our sites from) and statistics (i.e. age, gender, location, device used, time of day) are used to improve the way our Site works and helps us to make it easier for you to find what you need. By using our Site you consent to the processing of data, which may include Personal Information as described in “How Google uses data when you use our partners’ sites or apps” which you can read at <https://policies.google.com/technologies/partner-sites>.

## How We Use Personal Information

By accessing and using our Services, you agree that we may use the Personal Information to do any of the following:

- provide information and Services you request;
- respond to any requests or correspondence from you;
- manage and improve content, functionality and usability of this Site and any related services;
- carry out internal research and development (including the development of new initiatives whether Funding related or otherwise);
- make Funding assessments;
- monitor compliance where you are granted Funding;
- consider employing you and/or for the purposes of administering any recruitment processes in respect of our trustees;
- where you are employed by us, for purposes relating to your employment;
- where you are appointed as a trustee, for purposes relating to your appointment;
- analyse website usage, trends and statistics;
- supply you with further information or announcements which may be of interest to you;
- carry out any other purpose that is authorised by you or permitted under the Act or any other law (such as to meet our AMLCFT obligations);
- any other purpose we make known to you at the time of collection of Personal Information (for example different Funding types may require you to provide different Personal Information).

## How We Disclose or Share Personal Information

We will not disclose your Personal Information except in accordance with this Policy, the Act or where permitted by law.

By using one or more of our Services you agree that, we may disclose your Personal Information for any of the purposes listed in “How We Use Personal Information” to:

- a person you have authorised us to do so;
- staff who require that Personal Information in order to provide you with the Services;
- third party contractors or service providers, or for our legitimate purposes;
- third parties acting on our behalf e.g. we use third parties to design and operate this Site, to conduct our surveys and for keeping you up to date with our latest news and events including our newsletter.

We will not sell, license or otherwise disclose your Personal Information to any third party.

## Third Party Websites

This Site may contain links to third party websites. We are not responsible for the content of such websites, or the way those websites collect, store, use, and disclose any Personal Information you provide, and nor do we endorse, any of the content on such websites.

When visiting a third party website from the Site, that website’s privacy policy applies. We encourage you to review the privacy statements of those websites so that you can understand how the personal information you provide may be collected, stored, used and disclosed.

We use Facebook, Instagram, and YouTube to communicate with you and the public about our work. When you communicate with us through services linked to from our website they may collect your Personal Information for their own purposes. We recommend you always check their

Privacy and Cookie policies for information about any cookies they may use, as that entity's policies will apply.

We make every effort to maintain the security of our internet connections however, no website, server, database, or data transmission over the internet is completely secure. We cannot ensure the security of any Personal Information transmitted from or to you. Once we have received your Personal Information, we will take all reasonable efforts to protect that Personal Information against unauthorised access, use, modification, disclosure or misuse.

### **Safeguarding your Personal Information**

We will take every effort to ensure your Personal Information, whether stored physically (in locked storage) or electronically (in systems managed by us, or third parties including cloud storage providers engaged by us for such purposes) is protected against loss, unauthorised access or use, modification, disclosure, or misuse. We do this through:

- locked storage facilities;
- firewalls and software protection programmes;
- secure servers;
- multifactor identification and password access protection;
- requiring all employees to adhere to policies relating to system use, privacy, and personal information protection;
- limiting access to those who need to know for our legitimate purposes.

Where we use third parties outside of New Zealand to store your personal information, we take all reasonable steps to ensure they have adequate security and are subject to comparable privacy standards to those in the Act.

We retain your Personal Information only for as long as it is required for the purpose(s) for which the Personal Information was collected, or for which it may be lawfully used.

You agree that, where we make this known to you at the time of collection, we may use and retain your Personal Information for statistical and research purposes and for the purposes of undertaking data analytics, insights or data mining (including the aggregation of your Personal Information with other data to identify patterns and trends, and use the full benefit of that analysis). Where you do not want your Personal Information retained for such purposes, you may request us to not to do so at the time of collection.

When we no longer need your Personal Information we will securely delete it within a reasonable timeframe.

### **How to Access, Update or Correct Your Personal Information**

You can access, request, or correct your Personal Information by contacting our Privacy Officer using the details below. We may ask for additional information to verify your identity. The Act requires us to make a decision on your request and convey this to you within 20 working days. If we cannot do this within 20 working days, we'll let you know and explain why.

The Act permits us to withhold Personal Information from you in certain circumstances, such as:

- where the Personal Information is legally privileged or despite reasonable efforts to locate the Personal Information, it can't be found;
- where providing it would disclose a trade secret or would be likely to unreasonably prejudice the commercial position of the person who supplied/is the subject of that information;
- if disclosure of that Personal Information would involve the unwarranted disclosure of

the affairs of another individual.

If we withhold Personal Information from you, we'll tell you why.

### **Questions and Complaints**

If you have a question about this Policy or wish to make a complaint relating to your Personal Information, contact our Privacy Officer at [privacy@communitytrustsouth.nz](mailto:privacy@communitytrustsouth.nz) or by writing to Community Trust South, PO Box 1646, Invercargill 9810 or you can ring 0800 500 185.

You also have the right to make a complaint to the Office of the Privacy Commissioner by:

- completing an online complaint form at [www.privacy.org.nz](http://www.privacy.org.nz); or
- in writing to the Office of the Privacy Commissioner, PO Box 10-094, The Terrace, Wellington 6143.

### **Changes To This Policy**

We reserve the right to update, change or revise this Policy at any time. Changes to this Policy will take effect immediately once the updated Policy is published on this Site.

Please check the Policy periodically for changes. Your continued use of this Site or our Services following the posting of any changes to the Policy indicates your acceptance of those changes.

Last updated 23 March 2022.