



## Privacy Policy

### Policy purpose

[The Privacy Act 2020](#) governs how Safeguarding Children can collect, store, use and share your information. This Privacy Policy sets out how Safeguarding Children meets the Act and respects the information given to us by individuals and organisations. This Policy applies to personal information that we collect through all our business activities and functions.

### Our commitment

Safeguarding Children is committed to ensuring the privacy of individuals and organisations is protected. Should we ask you to provide personal information by which you can be identified then you can be assured that it will only be used in accordance with this Privacy Policy.

### What is personal information?

For the purpose of this Policy, and in accordance with the Privacy Act 2020, personal information is any information that can be used to personally identify an individual. The information does not need to name the individual, as long as they are identifiable in other ways. For example, an individuals age, gender, postcode and contact details (address, phone number, email address etc).

### What personal information do we collect?

Safeguarding Children may collect the following personal information:

- Name
- Contact information (postal address, email address, phone number etc)
- Billing information (billing address, purchase history etc)
- Computer related (browser identifiers, operating system, device used, IP address etc)
- Profession, occupation or job title
- Place of employment or sector
- Details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries
- Any additional information relating to you that you provide through our office, customer surveys or contact with Safeguarding Children representatives

### How do we collect personal information?

We do not collect personal information unless you choose to give it to us.

There are places on our website where you can choose to give us personal information, such as:

- Emailing an enquiry
- Registering for an event or training



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- Registering for online training
- Subscribing to our newsletter
- Through someone who has provided us with your information. For example, your employer to register you for training.

Safeguarding Children also collects information about individuals and organisations through:

- Consultancy work
- Surveys
- Training events
- Situations where we are approached for guidance regarding concerns for a child and we believe the child will be safer if we collect and share that information
- Conversations between you and our representatives

If you provide personal information through any of the methods listed, it will be held by Safeguarding Children.

### **Why do we collect personal information?**

The primary purpose for collecting information about you is to enable us to perform our business activities and functions and to provide quality customer service. We collect, hold, use and disclose your personal information for the following purposes:

- To provide products and services to you
- To provide you with news, information or advice about new and existing products and services
- To communicate with you
- To manage and enhance our products and services
- To personalise and customise your experience of our products and services
- To enable the operation of our business such as exchange of products and services for payment
- To ensure information provided is accurate, current, complete, relevant and not misleading
- For administrative, marketing (including direct marketing), promotional, planning, product and service development, quality control and research purposes or those of our contractors or external service providers
- To investigate any complaints about you, made by you, if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been engaged in any unlawful activity
- As required or permitted by any law including the Privacy Act 2020

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

### **What happens if we can't collect your personal information?**

If you do not provide us with the personal information described in this Policy, some or all of the following may happen:

- We may not be able to provide you with the products or services you requested, either to the same standard or at all. For example, if you do not register as a member of our online training platform, you will not be able to access features, products or services that are reserved for members only.
- We may not be able to provide you with information about products and services that you may want, including information about discounts sales or special promotions; or
- We may be unable to tailor the content of our products and services to meet your preferences and your experience of these may not be as useful or enjoyable.



### **Use of your personal information and disclosure**

Safeguarding Children will only use personal information that you provide to us for the purpose in which you supplied it or in exceptional situations, for other reasons required or permitted under the Privacy Act 2020. We may disclose your personal information to our employees, related bodies corporate, contractors or external service providers for the operation of our business including our website. The personal information you provide to us may be shared with third-party contractors to the extent necessary for them to administer and improve operations on our behalf.

### **How can I access my personal information?**

You can request access to any personal information we hold about you by contacting us. If we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you).

No charges apply for requesting or amending personal information held by Safeguarding Children. If you request access to personal information, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if it would interfere with the privacy of others or result in a breach of confidentiality. If this happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment we will add a note to the personal information stating that you disagree with it. We request that you keep your information as current as possible so that we may continue to improve our service to you.

For requests to access information that we may hold about you or any questions about this Privacy Policy, please [contact us](#).

### **How personal information is stored and kept secure**

We will electronically store and keep all personal information secure in accordance with the Privacy Act 2020. We will take all reasonable steps to protect the personal information that we hold from misuse, loss or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions. If you suspect any misuse, loss of or unauthorised access to your personal information, please let us know immediately.

### **When and who we share personal information with**

We will not sell, distribute, release or lease your personal information to third parties unless we are required by law to do so.

Safeguarding Children will share information about a child if there is a concern for their safety and wellbeing. In such instances, we will always attempt to inform the referrer of our intent to share this information prior to doing so unless to do so would pose a risk to the child.

Safeguarding Children may share this information with statutory agencies, such as the Police, Oranga Tamariki or any other agency involved in that child's life if we believe the child will be safer or harm will be prevented.

For more information about how and when Safeguarding Children may share information in relation to a child, please see our Child Protection Policy.



### **Surveys**

We use confidential surveys to evaluate our services. Online surveys are not anonymous as IP addresses are traceable. Sometimes individuals may give feedback that requires us to contact them to improve our services. We may be able to identify the individual from the information they have provided. Contact will only be made if a question or suggestion placed in survey feedback is deemed as requiring a response.

If an individual lodges a complaint, makes a comment or gives feedback through a survey, we will collect their email address and other contact details if required. We may use this email address to respond to the individual.

### **Credit card information**

If you purchase a Safeguarding Children product or service online, your credit card payment will be processed by STRIPE. STRIPE will encrypt and securely store your credit card number in accordance with their [Privacy Policy](#). STRIPE protects personal information (at a minimum) to the Payment Card Industry Data Security Standards (PCI-DSS). Your credit card number is not held by or revealed to us.

### **Direct marketing**

Occasionally, we may communicate with you via direct marketing. Such communication will include information about products and services we offer which may be of interest to you. These communications will be by email and in accordance with applicable marketing laws.

You can opt-out of receiving email communications by contacting us directly or using the opt-out facilities provided (for example, an Unsubscribe link). Your contact details will then be removed from our mailing list. We do not provide your personal information to other organisations for direct marketing unless expressly authorised by you.

If you receive communications from us that you believe have been sent to you other than in accordance with this Policy or in breach of any law, please contact us as soon as possible.

### **Website analytics**

We analyse non-identifiable web traffic data using Google Analytics (a paid, third party service) to improve our services. Safeguarding Children owns the data generated and it will not be shared with any other party.

We may collect, hold and use statistical information about site visits, such as:

- An IP address
- Search terms used
- Non-identifiable user statistics such as age, gender, date and time site visited, type of device used and operating system (Windows XP, Mac OS X etc)
- Type of web browser used (Internet Explorer, Mozilla Firefox etc)

The data collected is aggregated and is not personally identifiable. IP addresses are masked so that they cannot be used to identify individuals. Our web analytics will also respect any 'do not track' setting you might have set in your browser.

### **Cookies**

In some cases, we may collect your personal information through the use of cookies. When you access our website, we may send a cookie (a small summary file containing a unique ID number) to your computer. This enables us to recognise



## Safeguarding Children

Tiakina ngā tamariki

your computer and greet you each time you visit our website without bothering you with a request to register or log-in. It also helps us keep track of products or services you view so that we can send you news about these.

We also use cookies to measure traffic patterns, to determine which areas of our website has been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our products and services.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may also collect anonymous data (not personal information) relating to your activity on our website (including IP addresses, the electronic addresses of computers connected to the internet) via cookies or from a survey response. We generally use this information to report statistics, analyse trends, business administration, diagnose problems and improve our products and services. This information does not constitute personal information as it does not identify you or anyone else and may be used for any purpose and means.

### **Links to social networking services**

We do use social networking services such as Facebook and LinkedIn to communicate with the general public about our work. If you communicate with us using any of these social networking services, they may collect your personal information for their own purposes. These services may track your use of our website on pages where their links are displayed. If you are logged in to any of services while using our website, their tracking will be associated with your profile with them. These services have their own Privacy Policies which are independent of Safeguarding Children.

### **Links to other websites**

Our website may contain links to other sites of potential interest. If you use these links to access external websites, Safeguarding Children cannot be held responsible for the protection and privacy of any information which you provide while visiting these sites. Our Privacy Policy does not apply to these sites. You should exercise caution and read the Privacy Policy of the applicable external website.

### **Business software**

We use a variety of reputable software programmes for our business activities and functions. These include accounting and Customer Relationship Management (CRM) programmes which hold personal information. These programmes have their own Privacy Policies which are independent of Safeguarding Children.

### **Notifiable privacy breaches**

If Safeguarding Children has a privacy breach that it believes has caused (or is likely to cause) serious harm, we will notify the Office of the Privacy Commissioner and affected individuals as soon as possible. Under the Privacy Act 2020, it is an offence to fail to inform the Privacy Commissioner when there has been a notifiable privacy breach. Any liability for breach notifications sits with Safeguarding Children, not individual employees.

Not all Privacy breaches need to be reported. The threshold for a notifiable breach is 'serious harm'. This can be assessed by considering, for example, the sensitivity of the information lost, actions taken to reduce the risk of harm, the nature of the harm that could arise, and any other relevant matters.



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For more information on privacy laws in New Zealand and contact details for the Office of the Privacy Commissioner, visit the Office of the Privacy Commissioner [website](#).

### **Making a privacy complaint**

If you believe we have breached your privacy, please [contact us](#) as soon as possible and provide details of the incident so that we can investigate it. We may contact you during the investigative process to seek further clarification if necessary. If a breach is found, we will rectify the situation as required to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

All complaints (and enquiries) will be treated confidentially. After receipt of your complaint, a Safeguarding Children representative will contact you within a reasonable time to discuss your concern and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

You can also make a complaint to the [Office of the Privacy Commissioner](#).

## Document management and control

This Policy will be reviewed and amended if necessary by the CEO and Board Chair of Safeguarding Children. Any significant child protection episode or change in applicable legislation will also instigate a review and amendment of this document.

**Prepared by:** Willow Duffy, Safeguarding Children CEO

**Approved & signed by** Brendon Silcock, Board Chair

**Safeguarding Children Board Representative:**

**Date approved:** 04 May 2022

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