



POLICY STATEMENT

NAME	Privacy Policy
NUMBER	7.1
APPROVAL	Chief Executive Officer
POLICY OWNER	Chief Operating Officer

1. PURPOSE

The purpose of this document is to set out the minimum requirements for the collection, storage and use of personal information by REANNZ.

2. SCOPE

This policy applies to all REANNZ Employees, Officers, Contractors, Interns and Consultants.

This policy applies to all personal information relating to an individual collected, stored, disclosed and used by REANNZ, including but not limited to Employee information, Customer and Member information, Supplier information and Network Information.

3. POLICY STATEMENT

REANNZ’s collection, storage, disclosure and use of personal information will be in accordance with the Privacy Act 1993, and [State Services Commission model standards for information gathering](#) associated with regulatory compliance . REANNZ will:

- a) collect personal information directly from the person concerned unless there are legitimate reasons not to (eg the information is publicly available)
- b) collect no more than the minimum amount of personal information necessary to achieve the purpose for which the information is required
- c) ensure the information collected is stored securely
- d) actively manage access to and use of the personal information it holds to protect the privacy of individuals
- e) keep personal information for the period of time required by law
- f) have a Privacy Officer to oversee compliance with the requirements of the Privacy Act 1993 and manage any breaches of privacy or complaints.

4. RESPONSIBILITIES

The Chief Financial Officer is REANNZ’s nominated **Privacy Officer**. The primary role of the Privacy Officer is to encourage the organisation’s compliance with the privacy principles and provisions of the Privacy Act 1993. The Privacy Officer will also deal with requests for personal information and issues concerning

personal information generally.

5. DEFINITIONS

“Personal Information” is any information that tells us something about a specific individual. Information can include personal information such as notes, emails, recordings, photos and scans, whether they are in hard copy or electronic form.

6. EMPLOYEE INFORMATION

REANNZ will only collect and hold personal information about Employees that is relevant to the person’s employment with REANNZ.

Information about an individual’s employment with REANNZ will be held in a personnel file. These files may be held in a number of places in electronic or hard copy format. REANNZ will take all practical steps to ensure that access to personnel files and the information they contained is only accessible by:

- a) The Employee concerned
- b) The Employee’s manager
- c) The Chief Executive
- d) Appropriate staff in the Corporate team for the purposes of processing payroll and maintaining accurate employee records.

Information about Employee’s computer, internet, email and phone use may be collected in line with REANNZ 5.8 Information & System Security Policy.

7. NETWORK USER’S INFORMATION

REANNZ collects data relating to use of the network (“network information”) as part of prudent business practice for the purpose of monitoring and improving network performance, measuring network performance and usage, troubleshooting network issues, performing network diagnostics, network management, network security and for reporting network usage and trends.

As a general rule, personal information relating to an individual is not collected as part of network measurement activity.

All Network information collected will be in accordance with the 8.3 Network Measurement Policy.

8. ACCESS

Individuals may access information held about them in accordance with Principle 6 or the Privacy Act 1993 (see Appendix One).

A request for personal information must be dealt with as soon as reasonably practicable, and not later than 20 working days after the date on which the request was received, unless an extension is necessary

due to the large quantity of information sought or the need for extensive consultation regarding the request.

9. USE

REANNZ must take reasonable and practical steps to ensure that personal information is up to date, accurate, relevant and not misleading before using it.

Information collected from a person for one purpose should only be used for that purpose, unless any of the provisions of Principle 10 or Principle 11 of the Privacy Act 1993 apply (see Appendix One).

10. COMPLAINTS & BREACH

A breach of one or more of the privacy principles by REANNZ is interference in the privacy of the individual and gives rise for complaint if the breach is likely to negatively affect the individual.

Employees, Officers, Contractors and Consultants should notify the Privacy Officer immediately if they become aware of or suspect that a breach of privacy has occurred. If the Privacy Officer is the subject of a complaint, concerns should be raised with the Chief Executive.

The Privacy Officer (or, if inappropriate, the Chief Executive's nominee) will investigate the breach, in line with the Privacy Commissioner's Privacy Breach Guidelines¹, and report to the Chief Executive and the individual concerned on the results of the investigation. Should the complaint be upheld, REANNZ will implement all necessary and reasonable steps to remedy the complaint, and ensure processes are in place to avoid similar complaints.

Deliberate breaches of the privacy of personal information held by REANNZ will be treated as a disciplinary matter.

11. REFERENCES

- Privacy Act 1993
- Privacy Breach Guidelines 5 March 2008; Privacy Commission

12. RELATED POLICIES

Related policies that may impact on, or be impacted by, this policy:

- REANNZ 5.8 Information & System Security Policy
- REANNZ 8.3 Network Measurement Policy
- Website privacy statement

¹ <http://privacy.org.nz/privacy-breach-guidelines-2/?highlight=Privacy%20Breach%20Guidelines>

Document version control		
Policy Reference	7.1	
Status	Approved	
Written by / (Owner)	COO	
Approved by	Board	Via Audit and Risk Committee
Review period	Three years	Next review July 2021

Version History

Version	Date	Reviewed / Approved By	Purpose/Change
2.0	Nov 2012	HR Committee	Substantive rewrite
2.0	Dec 2012	Board	Approved v2
2.1	July 2014	Audit Committee	Minor edits.
2.1	August 2015	Audit Committee	Minor edits
2.2	September 2018	Management	Minor Edits – no policy change
2.2	April 2019	Management	Added reference to new SSC model standards in information gathering