



## **PRIVACY STATEMENT**

### **PURPOSE**

The Anglican Diocese of Auckland (“the Diocese”, **we, us, our**) is committed to protecting the privacy of individuals and maintaining privacy standards regarding the personal information we collect in compliance with the New Zealand Privacy Act 2020 (**the Act**) when dealing with personal information. This relates specifically to the collection, storage and security, access and correction, accuracy, retention, use and disclosure, and unique identifiers collected regarding members of our parishes and visitors/guests.

### **APPLICATION**

This policy applies to those that are employed by the Diocesan Council, including temporary and fixed term employees and volunteers; all members of the Clergy/Episcopal Team; contractors and representatives of the Anglican Diocese of Auckland that hold information regarding individuals.

### **DEFINITIONS**

#### **Definition of Personal Information**

Personal information means information about an identifiable individual. It includes your name, date of birth/age, gender and contact details as well as health and other information that would enable you to be identified.

### **1. POLICY**

- 1.1 We will provide access to information for clergy, employees, volunteers regarding the obligations under the Act and provide with training to enable them to fulfil these.
- 1.2 The Diocese will appoint a Privacy Officer who will facilitate compliance with the Act.
- 1.3 Effective internal policies and processes will be in place to prevent personal information being collected, held, shared/exchanged, accessed, or disposed of improperly.
- 1.4 This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

### **2. Collection of Personal Information**

- 2.1 We do not collect personal information unless it is for a lawful purpose connected with a function or activity of the Diocese or directly related to the purpose for which the information was obtained.
- 2.2 Personal information collected by us will usually fall into one of the following categories:
  - Contact information (e.g. name, age, address, email address and telephone numbers).
  - Unique identifiers – an identifier that is assigned to an individual by an agency other than the Diocese for the purposes of the operations of that agency.

- Employment information (e.g. employment history, work performance, absences, workplace incidents, next of kin information).
  - Financial information (e.g. bank account details).
  - 'Sensitive' information (e.g. medical history, criminal history).
- 2.3 If possible, we will only collect personal information from you directly. We may collect your information from you in a variety of ways including face-to-face, over the telephone, through an online form or portal, through a paper form or by email.
- 2.4 Sharing your personal information with us is voluntary, however we may not be able to complete some operations or ministry requirements (including statutory, legislative, canonical requirements) without a certain level of personal data being collected. Any impact on an individual's ability to participate in said operations or ministry requirements will be discussed with the individual.
- 2.5 Sometimes we will collect personal information from a third party or a publicly available source if it is unreasonable or impracticable to collect the personal information directly from you (e.g. checking a candidate's work history).

We may also collect information about you from another source if:

- You have given your consent for us to collect your information from another source.
- The information will not be used in a form that identifies you.
- The Privacy Commissioner has authorised the collection of information in this manner.

### **3. Protecting and Storing Personal Information**

- 3.1 The Diocese endeavours to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of an individual's personal information. These safeguards are designed to prevent personal information from loss and unauthorised access, copying, use, modification, or disclosure. These include:
- Secure hard copy document storage (i.e. storing hard copy documents in locked filing cabinets).
  - Password protected data storage devices such as laptops, tablets and smart phones.
  - Providing a discreet environment for confidential discussions.
  - Access control for our building including reception protocols and measures for securing the premises when unattended.
  - Security measures for our website.
- 3.2 Although we take all reasonable steps to secure personal information from loss, misuse and unauthorised access, there is an inherent risk of loss, misuse, or unauthorised access to such information. The Diocese will not be held responsible for such actions where the security of the personal information is not within our control or we cannot reasonably prevent such an incident.

### **4. Use and Disclosure of Personal Information**

- 4.1 We will use your personal information:
- to verify your identity
  - to communicate news and developments, including contacting you electronically (e.g. by text or email for this purpose)
  - to improve the services, support, training, and other offerings that we provide to you

- to undertake credit checks of you (if necessary)
  - to bill you and to collect money that you owe us, including authorising and processing credit card transactions
  - to respond to communications from you, 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 you or the Act.
- 4.2 Regarding those employed directly by the Diocese, the Diocese may share employees' information with other Diocesan employees, consultants and other parties who require such information to assist the Diocese with establishing, managing or terminating the Diocese's employment relationship with its employees, or for purposes associated with the Protected Disclosures Act 2000.
- 4.3 The Diocese must comply with Privacy Principle 11 of the Privacy Act 2020 which provides that information should not be disclosed to third parties unless:
- The disclosure is directly related to the reason the information was collected in the first place.
  - The individual has authorised the disclosure.
  - The information is publicly available.
  - Disclosure is necessary for the maintenance of the law or for legal proceedings (e.g. for the Employment Relations Authority).
  - Where possible criminal or other unlawful activity is suspected.
  - Disclosure is necessary to prevent or lessen a serious threat to public health or safety, or the life or health of any individual.
  - The information is to be used in a form in which the individual is not identified.
  - Disclosure is authorised by the Privacy Commissioner.

## **5. Retention of Personal Information**

- 5.1 The Diocese will retain personal information until we no longer have a lawful purpose for doing so.

## **6. Accuracy of Personal Information**

- 6.1 We will strive to ensure that all personal information we collect, use or disclose is accurate, complete and up-to date.
- 6.2 If we are aware that we hold personal information that (having regard to the purpose for which it was collected) is inaccurate, out of date, incomplete, or irrelevant, we will take reasonable steps to correct that information. The Diocesan Privacy Officer should be contacted in any case of inaccuracy with an individual's information.
- 6.3 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 you requested the correction.

Subject to certain grounds for refusal set out in the Act, you also have the right to request a correction your readily retrievable personal information that we hold. Before you exercise this

right, the Diocese will require evidence to confirm the identity of the individual to whom the personal information relates.

## **7. Access of Personal Information**

- 7.1 All individuals may request to see their personal information. Request for access to personal information should be made in writing to the Privacy Officer.

The Diocese will provide access to view the personal information in the way preferred by the individual unless this would impair efficient administration, breach a legal duty, or breach an interest protected by one of the withholding grounds under the Act, following which the Diocese would then give reasons for the decision.

Individuals will be able to access to view their personal information with The Privacy Officer present. Individuals are entitled to all other personal information held by the Diocese about them, their wage and time records, holiday and leave records and information held by their managers.

- 7.2 The Diocese may withhold information pursuant to Part 4 of the Privacy Act 2020. The reasons for which information may be withheld include, but are not limited to, the following:
- Giving access to information would involve the unwarranted disclosure of personal information about another person or employee.
  - The information is protected by legal professional privilege.
  - Giving access to the information could hinder an investigation into a criminal offence.

## **8. Website and Internet use**

- 8.1 Reasonable steps will be taken to maintain secure internet connections. If you provide us with personal information over the internet, the provision of that information is at your own risk.
- 8.2 The Diocese is not responsible for personal information you provide to third party websites, regardless of if that website was accessed through the Diocesan website.
- 8.3 The Diocese uses cookies (alphanumeric identifiers) that monitor use of the website. It is the users' responsibility to disable cookies via the browser if desired. Disabling cookies may affect the functionality of the site.
- 8.4 Other website procedures relating to our privacy obligations will be displayed on the official Anglican Diocese of Auckland website and included as an appendix to this policy document. These privacy procedures may be updated independently of the review schedule for the Privacy Policy and Statement as required by Diocesan Management on a schedule that suits the communications needs of the Diocese.

## **COMPLAINTS**

If an individual considers that there has been a breach of the Act they are entitled to complain to the Diocese.

All complaints are to be in writing and addressed to the attention of the Privacy Officer on: [info@aucklandanglican.org.nz](mailto:info@aucklandanglican.org.nz).

The Diocese's Privacy Officer will investigate the complaint and attempt to resolve it within a reasonable timeframe.

## **RELATED LEGISLATION**

- Privacy Act 2020
- Unsolicited Electronic Messages Act 2007
- Human Rights Act 1993

## **OWNERSHIP AND REVIEW**

This policy has been approved by the Diocesan Council and is owned by the Privacy Officer. It is to be reviewed annually and updated as required.

Date of Publication: February 2023

## **Appendix - Privacy Information - Website**

In accordance with the Privacy Act 2020 and the Diocesan Privacy Policy and Privacy Statement, the diocese also follows the following privacy protocols as they relate to personal information and the use of this website.

Our website address is: <https://www.aucklandanglican.org.nz>. This website is owned by The Anglican Diocese of Auckland.

### **The personal data we collect on this site and why we collect it**

We collect information you have provided us with via this site. This might be your email address, phone number, name, billing address, home address, or other such details. This information is necessary for communication and engagement with you.

### **Cookies**

Some information is automatically collected about your interaction with our website. This includes information automatically stored by cookies and other session tools, for example, your IP address, your contact history (if there is any), etc. This information is used to improve your experience on the site. When you look at the contents of our website or use services on the site, your activities may be logged.

We may also gather information from our trusted partners with confirmation that they have legal grounds to share that information with us. This is either information you have provided to them directly or that they have gathered about you on other legal grounds.

You can change your cookie settings, but please be aware that some functions and services may not be available to you when you do so.

### **Contact forms**

We collect information that you give us when you use a contact form on our website. This information is emailed to us and may also be kept in our databases. You can ask us to remove this information from our records at any time. We use this information to contact you by phone and/or email and respond to you.

### **Embedded and linked content from other websites**

Articles on this site may include embedded content (e.g. videos, images, forms) and links to other websites. Embedded content and links from other websites behave in the same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded or linked content, including tracking your interaction with the content if you have an account and are logged into that website. Where you click on a link on our website, the website you are taken to will hold any information you provide on their website.

### **Analytics**

We use Google Analytics to gather information about who uses our website, how they interact with our site and other information that Google collects on our behalf. You can read Google's privacy policy [here](#).

## **How we use your personal data**

We use your personal data to enhance your website experience; fulfil an obligation under law or contract; or to contact you. For example, communicating with you in relation to any contact requests, and interacting with you about information related to the diocese.

We use your personal data on legitimate grounds and/or with your consent for the following purposes:

- to send you newsletters and event registration information (from us and/or our trusted partners); and
- for other purposes for which we have previously asked your consent.

We process your personal data to fulfil obligations arising from law, and/or use your personal data for options provided by law. We reserve the right to anonymise personal data gathered and to use any such data. We will use data outside the scope of these protocols only when it is anonymised.

## **Who we share your data with**

We value your privacy. Therefore we keep your information in confidence, except where we need to supply our third-party partners with information to fulfil any request you send and to complete necessary processes related to your interaction with us via this website.

## **How long we retain your data**

We retain your anonymised data indefinitely. We save information gathered about you for as long as needed for appropriate purposes or other obligations deriving from law, but no longer than is necessary. You can request that we correct and/or delete any personal data we hold about you. This does not include deleting any data we are obliged to keep for administrative, legal, or security purposes.

## **Data breach procedures**

Our data is stored on a secure cloud platform and is protected with reasonable technical and process controls. We cannot guarantee the security of information but will notify suitable authorities of data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

## **Contact information for privacy issues**

Please contact us at [info@aucklandanglican.org.nz](mailto:info@aucklandanglican.org.nz) about any issues relating to this information.

## **Changes to these protocols**

We reserve the right to make any changes to this information and the Diocesan Privacy Policy and Privacy Statement as necessary.