




# Otago Regional Council

## Customer Privacy Policy

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## 1. PURPOSE

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Your privacy is important to Otago Regional Council (referred to in this Privacy Policy as “we”, “our” or “us”). This Privacy Policy is for the control of our collection, use and disclosure of your personal information (as defined in the Privacy Act 2020 (Privacy Act) and has been prepared in accordance with our obligations and your rights set out in the Privacy Act.

## 2. SCOPE

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This policy applies to the Otago Regional Council and Emergency Management Otago and other agencies that support our work and that of Emergency Management Otago.

This policy does not apply to the Bee Scheme or Bee Cards.

It may be necessary to depart from this policy if any of the exceptions in the Privacy Act apply.

*Please note: we may change this Privacy Policy from time to time.*

## 3. POLICY CONTENT

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The personal information we collect may include your name, date of birth, addresses, email address, telephone numbers, gender, information on your use of our services or facilities and any other information provided by you in connection with, or specifically related to your communications with us or, your use of our services or facilities.

### 3.1. Collecting your information

In dealing with us, we will be collecting personal information about you. We will take steps to ensure that you are aware that the information is being collected and the reasons for doing so. We may collect personal information about you as set out below:

- (a) We may collect personal information about you when you or someone acting on your behalf provides information to us directly. For example, when you:
  - apply for employment with us
  - correspond with us, whether in person, by letter, phone, text, email, instant messages or other means of electronic communication
  - complete and submit forms we provide for applications for consents, licences, approvals, permits, funding or other authorisations or for the use of any of our services or facilities, including signing up for and using our online services and apps, such as our online payment services
  - prepare and submit a written submission, request or other feedback in relation to applications for consents, licences, approvals, permits, funding or other authorisations, or in relation to any form of draft or proposed plan, policy, bylaw or other document
  - use any of our services or facilities
  - subscribe to any of our newsletter or update services
  - follow or post comments in response to our social media or other facilities such as Facebook, Twitter, LinkedIn, YouTube, etc.

- (b) We may keep a record of any information that you acquire from us.
- (c) We may monitor and record phone calls made to or by us for quality control or staff training purposes. If a call is to be monitored and recorded, you will be informed of this at the time of the call.
- (d) We may collect personal information about you from other organisations, entities or persons, such as:
  - Our related organisations
  - Our suppliers which include organisations such as:
    - Land Information New Zealand
    - QV
    - Solicitors/conveyancers
    - The New Zealand Police, credit reporting agencies and other organisations, entities and persons where you have expressly authorised them to provide us with information.
- (e) When you visit one of our websites, we may use technology solutions such as “cookies” to provide you with better access to tailored information and services on the websites and to better serve you when you return to them.  
 Our internet service providers may also make a record of your visit and log information for statistical purposes. This information is only analysed on a bulk basis for broad demographic content. Individual use is not analysed. We do not attempt to identify users or their browsing activities unless they choose to give us personal information while using our website. If you choose to provide your contact details to subscribe to further information, your personal information will be collected by a third party service provider, acting on behalf of us. Subscriptions are optional and users can unsubscribe at any time.
- (f) “Closed Circuit Television” (CCTV) is used in Council offices to help reduce crime and anti-social behaviour.
- (g) Signage advising of CCTV equipment will give notice of areas covered by such equipment. CCTV footage will only be viewed by authorised people in accordance with the purpose noted above or for the purposes of regularly checking the system is operational. No attempt is made to identify individuals from CCTV footage except in relation to a reported or suspected incident requiring investigation.
- (h) To keep members of the public up to date on our activities, we film/record some of our meetings. You will know which meetings are being filmed/recorded as there will be a sign warning of this before you enter into the meeting room. Most of the filming/recording is of the elected members as they speak and debate at the meeting. The filming may also include shots of the public in the background and anyone speaking at public forum.

### 3.2. Using your information

The personal information that we collect from you or someone acting on your behalf may be used for any of the following purposes:

- (a) To provide you with services or facilities, including:

- those you have requested; and
  - assisting council to provide such services or facilities to you.
- (b) To positively confirm your identity. This is to avoid inappropriate release or use of your information.
  - (c) To respond to correspondence or to provide you with information that you have requested.
  - (d) To process your application for any consent, licence, approval, permit or other authorisation for which you have applied.
  - (e) To process your application to use or to register for any of our services or facilities, including our online services.
  - (f) To process payments received by or made by council.
  - (g) To respond to your requests, enquiries or feedback, or for customer care related activities.
  - (h) To provide you with information about our events, news, services or facilities, or the events, news, services or facilities that we consider may be of interest to you.
  - (i) To comply with relevant laws and regulations.
  - (j) To carry out activities connected with the running of our business or operations such as personnel training or testing and maintenance of computer and other systems.
  - (k) For any specific purpose which we notify you of at the time your personal information is collected.
  - (l) Assessing suitability for employment.
  - (m) For general administrative and business purposes.

### 3.3. Sharing your information

We may disclose personal information about you to:

- (a) Any person engaged by the council to provide products or services to you on our behalf, where your personal information is necessary for the provision of those products or services.
- (b) A third party if we are required to do so under any laws or regulations, or in the course of legal proceedings or other investigations. This may include sharing CCTV footage with the New Zealand Police or other public sector agencies where criminal activity is reported or suspected. The New Zealand Police may also access live feeds from certain CCTV cameras from time to time, for law enforcement, investigation and emergency response purposes.
- (c) Any person you authorise us to disclose your personal information to.
- (d) Any person, if that information is held in a public register.
- (e) Any person who views or listens to the filming/recording of any public meeting.
- (f) You should be aware that resource consent applications, including all supporting documents, are publicly available under s35 of the Resource Management Act 1991.

### **3.4. What if you do not provide us with the personal information requested?**

If you do not provide us with all of the personal information that we request from you, we may not be able to adequately respond to your correspondence, process applications you have submitted, provide the services or facilities you have requested, process payments or otherwise deal with any requests or enquiries you have submitted.

In some circumstances, failure to provide information when requested may be unlawful, and/or result in legal consequences. These circumstances and the potential consequences will be explained to you when your personal information is requested.

### **3.5. Security and accuracy**

We take reasonable steps to ensure personal information is:

- (a) Protected against loss, damage, misuse and unauthorised access. We restrict access of personal information to those individuals who need access to this information in order to assist us in performing our duties and obligations
- (b) accurate, up to date, complete, relevant, and not misleading.

### **3.6. How long we hold personal information**

We may retain all personal information that we collect (on both our active systems and our archive systems), for as long as administratively necessary, in accordance with the council's information retention and disposal schedule. The Public Records Act 2005 requires us to retain "protected records" indefinitely. In some circumstances, your personal information may be included within a protected record, including submissions you make in relation to bylaws, annual plans, and regional planning instruments.

### **3.7. Accessing and correcting your personal information**

You may request confirmation of whether or not we hold any personal information about you. You may request access to the personal information that we hold about you by emailing us at [legal@orc.govt.nz](mailto:legal@orc.govt.nz) or otherwise contacting us, at the addresses provided below. Once we have verified your identity, we will provide you with such confirmation and access unless one of the grounds for refusal to do so under the Privacy Act applies.

You may request that the personal information we hold about you be corrected by emailing us at [legal@orc.govt.nz](mailto:legal@orc.govt.nz). If we agree that your personal information is to be corrected, if requested we will provide you with an amended record of your personal information. Your rights of access to and correction of any personal information we hold about you are subject to the procedures set out in the Privacy Act.

## **4. RELEVANT DOCUMENTS**

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- Privacy Act 2020
- Public Records Act 2005

## 5. WHO YOU CAN CONTACT FOR FURTHER INFORMATION

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If you have any queries about this Privacy Policy or personal data Otago Regional Council has collected, please contact:

Otago Regional Council Privacy Officers

Email address: [legal@orc.govt.nz](mailto:legal@orc.govt.nz)