Privacy Policy

Overview and context

This policy is that of thinkstep-anz and relates to all business activities undertaken by thinkstep-anz staff.

This policy sets out how we collect, use, disclose and protect your personal information.

Personal information is any information about, or which identifies, an individual, including our staff, clients, and business partners. It is important to keep this personal information safe and manage it carefully and respectfully.

We will only collect, retain and disclose personal information that is required to operate effectively or comply with any law.

Changes to this policy

We may change this policy from time to time by uploading a revised policy onto our website. The change will apply from the date that we upload the revised policy.

Who do we collect your personal information from

We collect personal information about you through:

- when you engage with us via correspondence such as purchase orders, requests for quotes, telephone conversations and emails
- when you make inquiries about us, our products and services, or when you buy or use our services and products
- any registration or subscription process
- applications for prospective employment and contracting opportunities with us
- third parties where you have authorised this or where the information is publicly available.

How we use your personal information

We may use your personal information:

- to verify your identity
- to provide services and products to you
- to market our services and products to you, including contacting you electronically
- to improve the services and products that we provide to you
- to invoice you for services and products we have provided
- to respond to communications from you
- to conduct research and statistical analysis (on an anonymised basis)

- to protect and/or enforce our legal rights and interests
- to assess you for employment and contracting purposes;
- for any other purpose authorised by you or the *Privacy Act 2020 (NZ)* or *Privacy Act 1988 (AU)* and associated legislation

Disclosing your personal information

We may disclose your personal information to:

- any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products
- other third parties (for anonymised statistical information)
- a person who can require us to supply your personal information (e.g. a regulatory authority)
- any other person authorised by the *Privacy Act 2020 (NZ)* or *Privacy Act 1988 (AU)* and associated legislation
- any other person authorised by you

Protecting your personal information

We collect personal information that is needed only for a specific business purpose. We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

Accessing your personal information

Access to personal information is granted only to those who have a proper business reason to do so. Subject to certain grounds for refusal set out in *Privacy Act 2020 (NZ)* and *Privacy Act 1988 (AU)*, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

Notification

thinkstep-anz recognises that notification to individuals/organisations affected by a data breach can assist in mitigating any damage for those affected individuals/organisations.

If a data breach creates a risk of serious harm to an individual/organisation, the affected individual/organisation will be notified.

Where required by privacy legislation, we will notify the Privacy Commissioner in the relevant jurisdiction.

The requirements for reporting a data breach are set out in the Data Breach Management Procedure.

Internet use

While we take reasonable steps 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.

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

Our website uses cookies to recognise your browser when you revisit our site. No personal information is stored in a cookie, nor can such information be used to identify you. You may disable cookies in your browser

Contacting us

If you have questions about this privacy policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, please contact our Privacy Officer at governance@thinkstep-anz.com.

Signed By:  **Date:** 6 December 2021

Printing this policy

All official policies are updated electronically and available on our website. Before relying on a printed copy please check that you have the latest version.

Related policies

- Information Security Policy
- IT, Email and Social Media Policy
- Remote Work Policy
- Bring-Your-Own-Device Policy
- Data Breach Management Procedure

Document information

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1.0	6/12/2021	Policy release	AD / SC	BN	BN