

Title	PRIVACY POLICY				
Responsibility	<i>Operations with Executive Oversight</i>				
Ref No.	VPP030	Version No.	1	Date Issued	September 2023

1. PURPOSE

- a. **The Valley Project (TVP)** (“we, us, our”) comply with the New Zealand Privacy Act 2020 when dealing with personal information. This applies to all personal information that we collect, process or receive. This may be in person or via which we maintain; the website, email, social media, apps, over the phone, or through other channels.
- b. Personal information is information about an identifiable individual (a natural person), and includes personal data, personally identifiable information and equivalent information under applicable privacy and data protection laws.
- c. This policy does not limit or exclude any of your rights under the New Zealand Privacy Act 2020. For further information on the New Zealand Privacy Act 2020, see www.privacy.org.nz.

2. CHANGES TO THIS POLICY

- a. We may change this policy by uploading a revised policy onto our website. The change will apply from the date that we upload the revised policy.
- b. This policy was last updated on 17 August 2023.

3. WHEN DOES THIS POLICY APPLY?

- a. This privacy policy applies to personal information we collect from visitors to our website, our clients and other persons with whom we deal directly.

4. COMMUNITY MEMBERS

- a. Where we collect personal information from community members for the purposes of providing our services, where they person may be under the age of 18 we would seek that they have representation of the appropriate individual or parental consent for any such under 18 year old.

5. WHAT PERSONAL INFORMATION DO WE COLLECT?

- a. We will collect your personal information where you choose to provide it. The type of personal information we collect depends on the nature of our relationship with you.
- b. When you visit our website, we do not collect any personal information about you, except to the limited extent through the use of cookies.
- c. When you fill in a contact or enquiry form on our website, call us, meet us in person or otherwise contact us, we collect your name, email address, phone number and any other information you choose to provide to us.
- d. When you provide us with your personal information, you agree to allow our use of this information as detailed in this Privacy Policy. We try to only collect the personal information necessary to fulfil your request. We will notify you where the information we ask for is additional or optional.
- e. Some of the personal information that we collect directly from you may be mandatory and some may be optional. We will let you know which of these applies at the time we collect the relevant personal information. While you do not have to provide us with some of the information that we may request, this might mean that our services may not perform as well as they should, or that we may not be able to provide some parts of the website or all of our services

to you. If you require further information about the consequences of not providing us with any information, please contact us at privacy@northeastvalley.org

- f. When you access and use our website or related services we may automatically collect information about your device and usage of our website and services, including your IP address, operating system, browser type, time spent on certain pages of the website, pages visited and links clicked.
- g. Some of this data is collected through third party tools and/or the use of cookies, web beacons and similar storage technologies.

6. HOW WE USE YOUR PERSONAL INFORMATION

- a. We may use your personal information to:
 - i. Verify your identity.
 - ii. Provide our website and services to you.
 - iii. Provide you with documentation.
 - iv. Market our services to you, including contacting you electronically (eg by text or email for this purpose).
 - v. Improve our website and services.
 - vi. Publish things on our website (eg comments on pages).
 - vii. Run promotions (e.g. surveys).
 - viii. Respond to communications from you, including enquiries and complaints.
 - ix. Conduct research and statistical analysis.
 - x. Tailor content or advertisements on our website.
 - xi. Protect and/or enforce our legal rights and interests, including defending any claim.
 - xii. Respond to lawful requests by public authorities, including to comply with law enforcement requirements, or
 - xiii. For any other purpose authorised by you or applicable law.

7. DISCLOSING YOUR PERSONAL INFORMATION

- a. We may disclose your personal information to:
- b. Any business that supports (or delivers services you have requested in connection with) our website and services, including any person that hosts or maintains any underlying IT system.
- c. Third parties (for anonymised statistical information).
- d. Professional advisers (eg accountants or lawyers).
- e. A person who can require us to supply your personal information (eg a law enforcement agency or regulatory authority).
- f. Any other person with your consent.
- g. Any other person authorised by applicable law.

8. PROTECTING YOUR PERSONAL INFORMATION

- a. As required by applicable law, we will take steps to keep your personal information safe from loss, authorised activity, or other misuse. You play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used in relation to our services. You should not disclose any such password to third parties. Please notify us immediately if there is any unauthorised use of your account or any other breach of security.

9. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

- a. Subject to certain grounds for refusal under applicable law, you have the right to access your 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.
- b. When you request a correction, if we think the correction is reasonable and we are reasonably able to change your personal information, we will make the

correction. In all other cases, we will take reasonable steps to make a note of the personal information that was the subject of your correction request.

- c. If you want to exercise either of the above rights, email us at privacy@northeastvalley.org
- d. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information to be corrected and the correction that you are requesting).

10. INTERNET USE

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

11. DATA RETENTION POLICY

- a. The personal information that we collect and use is not intended to be kept longer than necessary for the purposes for which it is collected. Generally, we will keep personal information we collect for no longer than 1 year unless the law requires that we keep it for longer.

12. CONTACT INFORMATION

- a. If you have any questions about this Privacy Policy, or our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us as privacy@northeastvalley.org

The name and contact details of our Privacy Officer is:

Name: James Sutherland

Email: privacy@northeastvalley.org

Tel: 027 387 8909

13. LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION

- a. Our lawful basis for processing your personal information that we collect, use and disclose depends on the personal information collected and the context in which we collect it.
- b. Generally, we collect personal information from you where we have your consent, where processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract, or where processing is necessary for the purposes of our legitimate interests (except where such interests are overridden by your interests or fundamental rights and freedoms).
- c. Where we process personal information based on your consent, you may withdraw your consent at any time.
- d. Despite the above, we may process your personal information where such processing is necessary for compliance with applicable laws.
- e. If you have any questions about the legal basis on which we process personal information or need further information, please contact us at privacy@northeastvalley.org

14. YOUR RIGHTS

- a. Your rights in relation to your personal information include:

- b. Right of access - if you ask us, we will confirm whether we are processing your personal information and provide you with a copy of that personal information.
- c. Right to rectification - if the personal information we hold about you is inaccurate or incomplete, you have the right to have it rectified or completed. We will take reasonable steps to ensure inaccurate personal information is rectified. If we have shared your personal information with any third party, we will tell them about the rectification where possible.
- d. Right to erasure - when your personal information is no longer needed for the purposes for which you provided it, we will delete it. You may request that we delete your personal information and we will do so if deletion does not contravene any applicable law. If we have shared your personal data with any third party, we will take reasonable steps to inform those third parties that they must delete your personal information.
- e. Right with withdraw consent - if the basis of our processing of your personal information is consent, you can withdraw that consent at any time.
- f. Right to restrict processing - you may request that we restrict or block the processing of your personal information in certain circumstances. If we have shared your personal information with any third party, we will tell them about this request where possible.
- g. Right to object to processing - you may request that we stop processing your personal information at any time and we will do so to the extent required by applicable law.
- h. Rights related to automated decision making, including profiling - you have the right to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where such automated decision making is necessary for entering into, or the performance of, a contract with you, is authorised by applicable laws or is based on your explicit consent. We do not undertake automated individual decision making.
- i. Right to data portability - you may obtain your personal information from us that you have consented to give us or that is necessary to perform a contract with you. We will provide this personal information in a commonly used, machine-readable and interoperable format to enable data portability to another data controller. Where technically feasible, and at your request, we will transmit your personal information directly to another data controller.
- j. The right to complain to a supervisory authority - you can report any concern you have about our privacy practices to your local data protection authority
- k. Where personal information is processed for the purposes of direct marketing, you have the right to object to such processing, including profiling related to direct marketing.
- l. If you would like to exercise any of your above rights, please contact at privacy@northeastvalley.org If you are not satisfied by the way we deal with your query, you may refer your query to your local data protection authority.

15. THIRD PARTY WEBSITE LINKS

- a. If you follow a link on our website to another website, the owner of that website will have its own privacy policy. We encourage you to review that website's privacy policy before you visit that website.

16. DESIRED OUTCOMES

1. The desired outcome is to protect the privacy of the community who engages with TVP, while also protecting the organisation from any breaches of privacy.

5. REVISION HISTORY

REVISION HISTORY				
Version	Description of Change	Author/s	Effective Date	Next Review Date
1	Initial Release	James Sutherland	September 2023	September 2024

Name: James Sutherland Role: Chair

Signed:  Date: 11.09.2023