Purpose

Wade Group 2011 Ltd ("Wade Group", "we", "us" or "our") respects the privacy of the people we deal with and is committed to managing personal information responsibly and in accordance with the Privacy Act 2020.

This policy explains how we collect, use, store and disclose personal information. It applies to personal information relating to our employees and job applicants, customers and other business contacts, and users of our website and other online services.

Personal information we collect

The personal information we collect will depend on the nature of our relationship with you and may include:

Employees and job applicants:

Contact details, CVs, qualifications, employment history, references, right-to-work information and, where applicable, payroll, banking, tax, emergency contact, training, performance, leave and health and safety information.

Customers and business contacts:

Names, roles, organisations, contact details, correspondence, enquiries, quotations, orders, contracts, account information and other information generated through our normal business relationship.

Website users:

Information you provide through online forms or enquiries, together with technical information such as IP address, browser/device information and website usage information.

We will only collect personal information that is reasonably necessary for our business activities or where collection is otherwise permitted or required by law. This reflects the Privacy Act's requirements around the purpose and manner of collection.

How we collect information

Where practicable, we collect personal information directly from you, including when you:

- apply for employment or work for Wade Group;
- contact us or make an enquiry;
- purchase goods or services from us or otherwise engage with us;
- communicate with our employees;
- complete a form; or
- use our website.

We may also receive personal information from other people or organisations where permitted by law. This may include employment referees, recruitment providers, customers, suppliers, service providers or information that is publicly available.

Where we collect personal information about you indirectly, we will take reasonable steps to make you aware of the collection where required by the Privacy Act.

Where information is reasonably required for a particular purpose and you do not provide it, we may be unable to process an application, respond to an enquiry, provide a service or otherwise deal with the relevant matter.

How we use personal information

We may use personal information to:

- recruit, employ and manage our employees;
- respond to enquiries and communicate with customers and other business contacts;
- provide, administer and improve our products and services;
- manage customer, supplier and contractual relationships;
- process transactions, payments and accounts;
- maintain business, employment, quality, health and safety and other records;
- operate and improve our website and systems;
- protect the security of our people, premises, systems and information;
- meet our legal and regulatory obligations; and
- deal with disputes, investigations or other legitimate business requirements.

We will generally use personal information for the purpose for which it was collected, or for another purpose permitted under the Privacy Act.

Sharing personal information

We may disclose personal information where reasonably necessary to:

- employees who require the information as part of their role;
- contractors and service providers who provide services to Wade Group, such as IT, payroll, recruitment, professional advisory or other business services;
- customers, suppliers or other parties where required to carry out our business activities; or
- government agencies, regulators, law enforcement agencies or other parties where required or permitted by law.

We expect third parties handling personal information on our behalf to appropriately protect that information. The Privacy Act generally limits disclosure to the purpose for which information was obtained or another permitted basis.

Overseas service providers

Some systems or service providers used by Wade Group may store or process information outside New Zealand.

Where personal information is disclosed to an overseas organisation, we will take reasonable steps to ensure the disclosure complies with the Privacy Act and that appropriate safeguards are in place. The Privacy Act contains specific requirements relating to disclosure of personal information outside New Zealand.

Security and retention

We take reasonable steps to protect personal information from loss, unauthorised access, misuse, modification or disclosure. These measures may include physical, technical and organisational security controls.

We retain personal information only for as long as reasonably required for the purpose for which it was collected, or as required by law or legitimate business requirements, after which it will be securely deleted or disposed of where appropriate.

Website, cookies and analytics

Our website may use cookies and similar technologies to operate the website, understand how it is used and improve the user experience.

You can control or disable cookies through your browser settings, although doing so may affect some website functionality.

We may use third-party analytics or technology providers to assist us with operating and analysing our website. Information handled by those providers will be subject to the safeguards outlined in this policy.

Accessing or correcting your information

You have the right to ask us for access to personal information we hold about you and to request correction of that information.

If you believe information we hold about you is incorrect or you would like access to your information, please contact our Privacy Officer using the details below. These access and correction rights form part of the Privacy Act's information privacy principles.

Privacy breaches

If we become aware of a privacy breach, we will assess and respond to it in accordance with our legal obligations. Where a breach has caused, or is likely to cause, serious harm, the Privacy Act requires notification to the Office of the Privacy Commissioner and, subject to the applicable exceptions, affected individuals.

Contact us

If you have a question, concern or complaint about privacy, or wish to access or correct your personal information, please contact:

Privacy Officer

Wade Group 2011 Ltd

PO Box 10015, Te Rapa, Hamilton 3214, New Zealand

Email: pele@wadegroup.co.nz

Phone: +64 7 957 9645

You may also raise a privacy complaint with the Office of the Privacy Commissioner if you are not satisfied with how we have handled a privacy matter.

Changes to this policy

We may update this policy from time to time to reflect changes to our business practices or legal requirements. The current version will be made available on our website.