

<b>8. Skylight Trust - PRIVACY POLICY</b>		Section: 1
		Ref No: 9
Category:	Governance and Management	
Policy Owner:	Skylight Trust	
Authorised By:	Skylight Trust Board	
Date of First Policy:	Date of Last Review:	Next Review Date:
	February 2024	February 2027

## Introduction

Skylight Trust complies with the New Zealand Privacy Act 2020 (the **Act**), when dealing with personal information. Personal information is information about an identifiable individual, (a natural person).

Skylight appoints the Director of Operations as the Privacy Officer

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

## Changes to this Policy

We may change this policy by uploading a revised policy on to the Skylight website. Any change will apply from the date that we upload the revised policy.

## Who we collect your personal information

We collect the following personal information about you

- Name
- Email and phone number
- Address
- Ethnicity
- Birthdate
- Professional unique identifiers
- Interactions with us

## How we use your personal information:

We use personal information for the following purposes:

- to confirm your identity
- to provide you, as our client, with the information and services that you have requested
- paying accounts, invoices or generating bills
- to investigate and resolve complaints concerning the provision of services

- to comply with legislative and regulatory requirements and provisions; and
- to perform administrative functions including accounting, risk management, and record keeping.
- If data is to be transferred or hosted outside New Zealand, we check that service providers and countries have similar data compliance and standards
- Annually, review Skylight's compliance with Payment Card Industry standards for receiving onsite or online payments.

### **Why is this information collected?**

- provide the required service and advice you requested
- administer and manage those services, including charging, invoicing, and debt collection
- contact you to provide advice or information relating to your request.
- improve the quality of our services through research and development.
- conduct regular surveys to gain an understanding of individual needs.
- maintain and develop business systems and infrastructure to improve the services we provide.

### **Disclosing your personal information**

We may disclose your personal information:

- for the purpose for which it was collected (or a purpose that is directly related to the purpose, in connection with which the information was obtained);
- for any other purpose for which you have authorised; and
- otherwise, where we are permitted or required to do so by law.

### **Protecting your personal information**

We will take reasonable steps to protect your personal information from loss, unauthorized activity, or other misuses.

Skylight staff will be extended training on the privacy and confidentiality of clients' personal information.

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

Subject to certain grounds for refusal, set out in the Act, 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 require evidence to confirm that you are the individual the personal information relates to.

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.

If you wish to exercise either of the above rights, email [lesley.brown@skylight.org.nz](mailto:lesley.brown@skylight.org.nz). Your email should provide evidence of who you are and set out the details of your request (e.g., the personal information required, or the correction you are requesting). We may charge you reasonable costs for providing copies of your personal information or correcting that information.

## **Internet Use**

We take all reasonable steps to maintain a secure internet connection. Skylight will take all reasonable steps to protect any personal information received via the internet. Skylight extends ICT training on cyber-attacks and notifies staff on risk alerts and updates to staff. 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 any personal information.

## **Retention and Deletion of information**

As a rule, we keep your personal information for only as long as reasonably necessary for the purpose for which it was collected. However, longer retention periods may apply to the following categories of information:

- Information we are required by law or our contractual obligations to hold for 7 years.

While we will consider and action any request from you to delete your information, there is information that we are obliged by law to retain despite your request for deletion.

## **What we do if there is a privacy breach**

If we believe that there has been a privacy breach, we will identify the issue and take steps to minimise any harm.

If we believe the breach has caused or is likely to cause serious harm, we will contact the Office of the Privacy Commissioner. We will also contact clients who may be affected by the breach.

If you believe there has been a privacy breach, contact us as soon as possible.

## **Contacting Us**

If you have any questions about this Privacy Policy, or our privacy practices, or would like to request access to or correction of, your personal information, email [lesley.brown@skylight.org.nz](mailto:lesley.brown@skylight.org.nz).

## **What to do if you are not satisfied with our resolution process**

If you have been through our complaints and resolution process but are not satisfied, you can escalate a privacy complaint to:

Office of the New Zealand Privacy Commissioner

Online: <https://privacy.org.nz/>

Phone: 0800 803 909

Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)

(From overseas) +64 (0)4 474 7590