

# Privacy Policy

This privacy policy explains how we, EQ8 Accounting Limited and Adele M Maraki Chartered Accountant Limited collect, store, use, and share your personal information. This Privacy policy applies across all websites owned and operated by us, all services we provide including educational training, workshops, accounting programs and general support.

Openness and transparency are important to us. The Privacy Act 2020 requires us – like any other New Zealand agency – to tell you certain things about the personal information we need to carry out our services. This is where we explain our privacy practices and why you can trust us to handle your information with care and respect. This privacy policy has been created to ensure you understand how we treat personal information that we gather or process when you are using our services. Our services are not intended for children and we do not knowingly collect data relating to children.

## **In short, here are a few key privacy messages to note:**

- We only collect personal information where this is necessary to carry out our services
- We may collect personal information about you either directly from you or from other people or agencies, and we may generate personal information about you when we carry out our services
- We store all our data (including your personal information) on a secure Scottronic Hosted Backup platform. We protect our data with all reasonable technical and process controls
- You can ask us for a copy of your personal information at any time. We will be as open as we can with you but must also ensure we meet our secrecy obligations
- We will only use and share personal information where necessary to carry out the services for which we collected it, or if required by law

If you cannot find the information you need, or you have concerns about the way we are managing your personal information, then please contact us at any time:

We may update this privacy statement from time to time, for example to reflect changes to the Privacy Act, so feel free to check in again occasionally to see what might have changed. This statement was last updated in November 2020.

## **What personal information do we collect about you?**

We request, receive, and use significant amounts of sensitive personal information including your name, email address and physical address.

The Privacy Act empowers us to demand the information we need to carry out our services and also requires us to protect it and only disclose what we consider is necessary to give effect to the Act.

## **Information collected automatically**

Whenever you interact with our website or use our services, we automatically receive and record information from your browser. We use tracking technology to record

information such as your device, your IP address, search terms used, browser type, the referring site (if any) through which you clicked to our website, the pages you accessed on our website and the links you clicked on, and the date and time you visited the site. We use this information to monitor and analyse the use of our website and services so that we understand how our website and services are being used and to improve functionality so that we can provide the best experience possible for our clients (though please note we make no efforts to associate this with your identity).

### **Information from you directly**

Most of the personal information we collect is provided directly by you, or your authorised representative, when you engage with us and ask us to complete the required services, or when we request it from you when you respond to an inquiry.

You do not have to provide your personal information to us. However, we may not be able to effectively provide you with services or carry out our functions if you do not provide us with the information we need. If you have information that is relevant to the services we provide, you will have to comply with a demand for that information.

The personal information we may collect from you directly includes:

- your name
- your contact details, including your address, email address or phone number
- information about your authorised representative (if you have one)
- any documents or other information you provide to us as part of the services we provide
- correspondence from you (we don't record phone calls, but we may keep a summary of our conversations with you)

### **Information from another person or agency**

We may also need to request or receive personal information about you from other people or agencies in order for us to carry out our services.

We may collect personal information from the following people or agencies:

- The Inland Revenue Department
- ACC
- WINZ
- Banks/Bankers
- Solicitors
- Lawyers
- Finance Companies
- Creditors

## How will we use your personal information?

We use the personal information you provide to us for the purposes of delivering the services you have requested or carrying out our lawful functions. Where we need to use information in a way we have not anticipated here, we will only do so if required or permitted by law or with your authorisation.

We may use your personal information to:

- send you various communications. This may include general communication regarding the services we provide to you, notifications about new or updated services offered in relation to our services or providing you with information you've requested
- communicate with an agency
- review and improve the delivery of our services
- review and improve our website and the delivery of our online service
- conduct internal statistical analysis and meet our reporting requirements

## Do we share your personal information?

We may share personal information where necessary in order to give effect to the Privacy Act including properly carrying out our functions. There are times when we need to share your personal information with third parties. However, we will only share your personal information to:

**Third party service providers and partners** who assist and enable us to use the personal information to support the delivery of, or provide functionality, for our services, or to market or promote our services to you. Such third parties do not have any right to use the personal information we share with them beyond necessary to assist us and they shall only process your personal information in accordance with the privacy notice.

**Regulators, law enforcement bodies, government agencies, courts or other third parties** where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. We will notify you of this type of disclosure where possible and appropriate.

**An actual or potential buyer** (and its agents and advisors) in connection with an actual or proposed purchased, merger or acquisition of any part of our business.

**Other people**, where we have your consent.

## Where do we store your personal information?

We use third party providers to store and process our data. We take all reasonable steps to ensure the personal information we collect is protected against loss, unauthorised access and disclosure or any other misuse, including meeting the requirements

prescribed by the New Zealand government for the secure handling, storage, and disposal of any protectively marked or security classified information.

We ensure that our third-party data processors can meet our privacy and security requirements. We are satisfied, for example, that Scottronic has adequate security and privacy safeguards in place to protect information it holds on our behalf.

Read more about Scottronic's privacy and security practices  
<https://www.scottronic.co.nz/en/>

Your personal information is processed on servers based in Kerikeri, New Zealand. New Zealand has been identified as providing adequate protection for European Economic Area (EEA) data. This adequacy status means that personal information can be legally sent to New Zealand from Europe for processing without special additional measures being taken by European firms.

We use various online systems and tools, including certain customer relationship management, marketing automation and email delivery services ('Tools') to allow us to communicate with our users. As part of our use of these Tools, certain personal information is sent to the providers of the Tools. We ensure that providers of these Tools comply with the requirements of the GDPR.

### **How long will we keep your personal information?**

The length of time we keep your personal information depends on whether we have an ongoing business need to retain it, e.g. to provide you with a service you have requested or to comply with applicable legal requirements. We will retain your personal information for as long as we have an ongoing business need to retain it, in accordance with our data retention policies and practices. We will make sure it is deleted after this period.

### **What privacy rights do you have?**

The Privacy Act gives you a number of rights in relation to the process and protection of your personal information. You can take steps to control the ways we use your information (such as opting out of receiving newsletters). You can also complain to us at any time if you think we have misused your personal information. Requests can be made verbally or in writing, to the contact details available at the bottom of this document. We will respond to all requests as soon as possible and no later than 30 working days of receiving the request. We will be as open as we can with you, but please note that your right to request personal information is subject to section 206 of the Privacy Act, which requires that we maintain secrecy, in some instances even from you. We may also occasionally need to withhold personal information under sections 49-53 of the Privacy Act, for example where the information requested is legally privileged. However, we will only ever withhold information where necessary.

We won't charge you for this unless the request is manifestly unfounded or excessive. We may require you to verify your identity before we can disclose any personal information to you.

**Right of access.**

You have the right to request a copy of the personal information we hold about you. We will provide you with the following information:

- Confirmation that we are processing your personal information;
- A copy of the personal information we hold about you; and
- Other supplementary information relating to the processing of your personal information

**Right to rectification.**

You have the right to have inaccurate personal information rectified, and to have any incomplete data completed.

**Right to erasure.**

You have the right to have the personal information we hold about you deleted from our systems.

**Right to restrict processing.**

You have the right to request that we restrict or block the processing of your personal information in certain circumstances. We will continue to store your Personal Data, but we will not use it in any other way.

**Right to information portability.**

You have the right to obtain the personal information we hold about you and reuse it for your own purposes, across different services. We will provide your personal information in a format that is structured, commonly used, and machine readable.

**Right to object.**

You have the right to object to us processing your personal information, where the processing is based on legitimate interests or direct marketing. If you request that we stop using your personal information for direct marketing purposes, we will suppress your details from our marketing lists to ensure your preference not to receive direct marketing is respected in the future. All of our direct marketing emails will contain a link for you to unsubscribe if you no longer wish to receive them.

**Questions or concerns**

If you have any questions or concerns regarding this Privacy Policy, or the way we use your personal information, please send us a detailed message to [reception@eq8.co.nz](mailto:reception@eq8.co.nz). We will make every effort to resolve your concerns.

You also have the right to complain to your local Data Protection Authority. If you are based in New Zealand, you have the right to complain to the Office of the Privacy Commissioner. If you are based in the European Union, you have the right to complain to the Information Commissioner's Office. If you are based outside of New Zealand and the European Union, you have the right to make a complaint at any time to the

supervisory authority for data protection issues of the country in which you are based, or to the New Zealand Office of the Privacy Commissioner.

### **How to contact us**

You can contact us in the following ways:

- a) Sending an email to [reception@eq8.co.nz](mailto:reception@eq8.co.nz)
- b) Calling us on 09 4010 198
- c) Sending a letter to EQ8 Accounting Limited, PO Box 282, Kaikohe 0440, New Zealand; or
- d) Completing the enquiry form on our website.