

Confidentiality and Privacy Policy

1.0 Overview

The New Zealand **Privacy Act 2020** came into effect on 1 December 2020. Data security is critically important in today's environment, and this policy outlines how **Conduit Business Solutions Limited** handles personal and client data, as well as requests for access to this data.

2.0 Scope

This policy applies to all **employees, contractors and clients** of Conduit Business Solutions Limited and may be updated to reflect changes in technology, data collection practices, or legal requirements.

3.0 Conduit Business Solutions Responsibilities

We are responsible for:

- 3.1 Informing individuals about what information we collect and its intended use.
- 3.2 Collecting and storing only the necessary information for employment or client-related purposes.
- 3.3 Ensuring collected data is accurate, secure, and protected from unauthorized access.
- 3.4 Providing individuals with the right to review and correct personal information upon request.
- 3.5 Investigating and addressing any potential or actual breaches of privacy.
- 3.6 Notifying the Privacy Commissioner and affected individuals of any notifiable breaches as required under the Privacy Act 2020.
- 3.7 Ensuring compliance with cross-border data transfer laws by only transferring personal data outside New Zealand if the receiving country has comparable privacy protections, or with explicit consent.
- 3.8 Adhering to sector-specific regulations such as **AML/CFT (Anti-Money Laundering and Countering Financing of Terrorism Act 2009)** by collecting and verifying client identity information when required by law.
- 3.9 Handling medical or health-related personal information securely and using it solely for legitimate employment-related purposes (e.g., sick leave, health & safety), in accordance with the **Health Information Privacy Code 2020**.

4.0 Individual Responsibilities

You are responsible for:

- 4.1 Providing all relevant personal information when requested.
- 4.2 Keeping personal information (e.g., address, bank details) up to date.
- 4.3 Protecting confidential information obtained during work activities.
- 4.4 Immediately reporting any potential or actual privacy breaches.

5.0 Use of Information

Personal information may be used for:

- 5.1 Verifying identity.
- 5.2 Employment suitability and HR processes.
- 5.3 Fulfilling client work obligations.
- 5.4 Compliance with AML/CFT and tax record-keeping obligations.
- 5.5 Legal and regulatory requirements.
- 5.6 Other permitted uses as outlined by the Privacy Act.
- 5.7 Any **health or medical information** provided will be kept strictly confidential and only used for legitimate employment-related purposes, such as managing sick leave, workplace health and safety obligations, or other legally required health-related matters, in accordance with the **Health Information Privacy Code 2020**.

6.0 Data Retention & Security

- 6.1 Personal and client information is securely stored.
- 6.2 **Payroll records are retained for six (6) years after employment or contract ends.**
- 6.3 **Client information is retained for seven (7) years** in compliance with tax and financial regulations.
- 6.4 **Cross-border data transfers** will comply with **Privacy Act 2020 – Principle 12**, ensuring equivalent privacy protections or informed consent.
- 6.5 Information will be disposed of securely when no longer required.

7.0 Request for Access to Information

You may request access to or correction of your personal information by writing to the Privacy Officer - rachel@conduit.nz. Requests will be responded to within **20 working days**.

8.0 Company Equipment & Workplace Monitoring

- 8.1 Conduit Business Solutions Limited may collect information stored on company-provided devices (e.g., laptops, phones, surveillance cameras).
- 8.2 Employees and/or contractors should have a limited expectation of privacy regarding work equipment.
- 8.3 Any monitoring will be conducted fairly and lawfully, ensuring compliance with employment law.

9.0 Confidentiality Obligations

Employees and/or contractors must:

- 9.1 Treat **Confidential Information** as strictly private unless legally required to disclose it.
- 9.2 Use Confidential Information only for work-related purposes.
- 9.3 Not disclose, copy, or distribute Confidential Information without consent.
- 9.4 Not use Confidential Information to harm the organization, for personal gain, or to give a competitive advantage to another party.
- 9.5 Not make statements to the media without prior approval.

10.0 Whistleblower Protections

- 10.1 Conduit Business Solutions Limited supports a **safe environment for whistleblowers**.
- 10.2 Under the Protected Disclosures (Protection of Whistleblowers) Act 2022, employees and/or contractors can report serious wrongdoing without fear of retaliation.
- 10.3 Whistleblowers' identities will remain confidential unless legally required to be disclosed.
- 10.4 Retaliation against whistleblowers is strictly prohibited and will result in disciplinary action.
- 10.5 Reports may be made internally or to an appropriate authority as per the Act.

11.0 Reporting and Breach Notification

- 11.1 All **actual or potential data breaches** must be reported immediately to the Privacy Officer - rachel@conduit.nz.
- 11.2 Serious breaches that may cause harm will be reported to the Privacy Commissioner.
- 11.3 Breaches will be assessed based on the nature and sensitivity of the information, potential risks, and actions taken to mitigate harm.
- 11.4 Failure to report a known breach may constitute serious misconduct.

12.0 Return of Property & Termination Requirements

- 12.1 Upon termination, employees and/or contractors must **return all Confidential Information and company property**.
- 12.2 Electronic copies of confidential data must be deleted.
- 12.3 If requested, employees and/or contractors may need to provide a sworn statutory declaration confirming the return or deletion of company information.

13.0 Compliance with International Standards

- 13.1 Where applicable, Conduit Business Solutions Limited will comply with **international privacy regulations such as GDPR (General Data Protection Regulation) for EU clients** and **APEC privacy frameworks** for cross-border data protection.
- 13.2 Overseas transfers of personal data will follow best practice safeguards in line with New Zealand law and international privacy principles.

14.0 Further Information

For more details on privacy laws and regulations, visit:

- **Privacy Act 2020:** <http://www.legislation.govt.nz/act/public/2020/0031/latest/whole.html>
- **Office of the Privacy Commissioner:** <https://www.privacy.org.nz/privacy-act-2020/privacy-act-2020/>

15.0 Definitions

- **We, Us, Our:** Conduit Business Solutions Limited.
- **You, Your:** Employees, contractors and clients.
- **Confidential Information:** Any business, client, financial, or employee data not publicly available.
- **Serious Harm:** Includes financial fraud, identity theft, intimidation, family violence, or other significant adverse consequences.