

1.0 PURPOSE

- 1.1 The Privacy Policy sets out the expectations for how Linfox manages the personal information it collects, uses stores and discloses.
- 1.2 The Privacy Act requires that one person be designated as the company Privacy Officer.
- 1.3 The Privacy Officer for Linfox New Zealand is the Human Resources Manager, as Human Resources holds all employee personal information.

2.0 Definitions

Personal Information means any identifiable information about a person.

Document means a document in any form that may include or be comprised of Personal Information. A document includes:

(a) any writing on any material:

(b) any information recorded or stored by means of any tape recorder, computer, or other device; and any material subsequently derived from information so recorded or stored:

(c) any label, marking, or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means:

(d) any book, map, plan, graph, or drawing: and

(e) any photograph, film, negative, tape, or other device in which 1 or more visual images are embodied so as to be capable (with or without the aid of some other equipment) of being reproduced.

3.0 PRIVACY PRINCIPLES

3.1 Linfox may only collect personal information when:

3.1.1 The collection is for a lawful purpose, connected with what Linfox does, and

3.1.2 It is necessary for Linfox to collect such information for that purpose.

3.2 Personal information must usually be collected from the person the information is about. Sometimes it is acceptable to collect information from other people instead, or as well. In Linfox, we seek your agreement to collect information about you from anyone else.

3.3 When Linfox collects personal information from anyone, we must take reasonable steps to make sure that the person knows things like:

3.3.1 Why it is being collected

3.3.2 Who will get the information

3.3.3 Whether the person *must* give the information, or whether it is voluntary

3.3.4 What will happen if the information is not provided.

- 3.4 Personal information must not be collected by unlawful methods, or by methods that are unfair or unreasonably intrusive in the circumstances.
- 3.5 It is impossible to stop all mistakes. However, Linfox will do its best to ensure there are effective safeguards in place to prevent loss, misuse or disclosure of personal information.
- 3.6 All Linfox staff have the right to ask for access to your personal information.
- 3.7 Linfox staff have the right to ask Linfox to correct their information, if they think it is wrong. Linfox is not obliged to correct the information. However, Linfox is prepared to receive your view about what the correct information is.
- 3.8 Before Linfox uses or discloses personal information, we must take reasonable steps to check that the information is accurate, complete, relevant, up to date and not misleading.
- 3.9 Linfox is not permitted to keep the personal information of its staff for any longer than necessary for the purposes for which we are holding it.
- 3.10 Linfox must use personal information for the same purpose as it was collected.
- 3.11 Linfox may only disclose personal information in limited circumstances. One example is where another law requires us to disclose the information. In addition, Linfox may disclose the information if it reasonably believes that:
 - 3.11.1 disclosure is one of the purposes for which Linfox acquired the information, or
 - 3.11.2 disclosure is necessary to uphold or enforce the law, or
 - 3.11.3 disclosure is necessary for court proceedings, or
 - 3.11.4 the person concerned authorised the disclosure, or
 - 3.11.5 the information is going to be used in a form that does not identify the person concerned.
- 3.12 Some agencies give people a 'unique identifier' instead of using a person's name. Examples are a driver's licence number, a student ID number, or an IRD number.

Linfox is not permitted to use a unique identifier given to a person by another agency. Linfox staff are not required to disclose their unique identifier unless this is one of the purposes for which the unique identifier was set up, or directly related to those purposes (for example, an IRD number).

4. PRIVACY OFFICER

- 4.1 The Privacy Officer must:
 - 4.2 be familiar with the privacy principles in the Privacy Act
 - 4.3 work to make sure Linfox complies with the Privacy Act
 - 4.4 deal with any complaints about possible breaches of privacy
 - 4.5 deal with requests for access to personal information, or correction of personal information
 - 4.6 act as Linfox's liaison with the Privacy Commission.



5. Other Duties

- 5.1 The Privacy Officer will also:
- 5.2 train other Linfox staff to deal with privacy properly,
- 5.3 advise managers on how to ensure that Linfox's practices comply with privacy requirements, and
- 5.4 advise managers on the potential privacy impacts of changes to Linfox's business practices.

6. Review

This Policy shall be reviewed when the updated Privacy Act is in effect, and thereafter, annually.