

Privacy Policy

(DRAFT FEBRUARY 2021)

Purpose of this policy

The purpose of this policy is to explain how Transparency International New Zealand (TINZ, we, our, us) takes steps to respect your privacy. This policy details what personal information we collect, how we use it, and how you may access the personal information you share with us, including amending or deleting your contact or payment details.

Our Commitment to Data Security

TINZ is strongly committed to protecting your privacy. To that end:

- We will take steps to ensure that information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment.
- We only have access to/collect information that you voluntarily give us by completing a form, sending an email or other direct contact from you.
- We will not collect your identifying information if there is no need to do so.
- We will keep any information you share with us secure
- We will not misuse any information you share with us. We will not sell or rent your personal information to anyone.
- We do not release personal information to third parties for their own use, with the exception of meeting disclosure requirements as set out in the Privacy Act 2020.
- We will take particular care when collecting information from children and young people.
- Our policy and privacy practices have been updated to ensure compliance with the Privacy Act 2020.

Caveat

We cannot guarantee the security of any data you transmit to us electronically. These activities are conducted at your own risk.

Any information we collect is encrypted and transmitted to us in a secure way. We do not store any personal information, including contact details and payment information on our website. We also provide a range of options for you to contact us, including the [website contact form](#), email and mail.

Definition and scope (why we gather information)

“Personal information” is information about an identified individual. Examples include an individual’s name, address, contact number and email address. It also includes their IP Address.

This privacy policy applies to personal information collected by TINZ, including for the following purposes:

- to administer our relationships with members and donors;
- to process donations, membership fees and provide receipts;
- to process event and conference registrations;
- to disseminate information to individuals and organisations who have signed up to our e-newsletter;
- to disseminate information to TINZ members, including the e-newsletter and invitations to special events;
- to maintain accurate details of organisational history;
- to consider job applicants for current and future employment, as well as applicants for volunteer and intern positions.
- to undertake our general mahi, including responding to enquiries and requests for information.

Who handles personal information collected by us?

This policy applies to the handling of personal information by TINZ personnel (employees, contractors and volunteers) and governance who are responsible for the collection, storage and use of personal information.

Personnel and governance are also required to abide by our [Code of Conduct](#) and policies relating to finance, complaints, anti-bullying and harassment, conflict of interest, speak up policy, child protection and health & safety. The TINZ Board has established an Ethics Committee which provides advice on ethical questions and evaluates the handling of complaints and concerns and conflicts of interest.

TINZ engages with third party service providers to hold personal information that it collects.

How do we collect personal information?

We collect personal information in a variety of ways, including:

- when you interact with us in person, in writing, by telephone or via email;
- when you contact or submit a form through our website;
- when you send us a completed membership form or questionnaire;
- when you register for one of our events or conferences;
- when you submit an application for a job, volunteer position or internship with us;
- whilst you are employed by, or contracted with us;
- when you agree to take part in one of our volunteer activities.

What information do we collect and how?

The kinds of personal information we collect and hold about you depend on the nature of your dealings with us and the circumstances of collection.

We may collect and store your name, address, telephone number, email, employment details, payment card details (including transaction details/history), IP Address, authorisations, records of your communication and interaction with us and details/history of preferences, interests and behaviour relating to products, services and activity with our digital services.

Some information regarding website activity is collected automatically and anonymously via Google Analytics to help us understand users' experience of the website (see further below)

All payments for membership and donations and are processed via a secure online payment platform.

How do we use the personal information that we collect?

How we use that information depends on the nature of your dealings with us. For example we do not add a person's name to our mailing list if they have contacted us for general information, or to make a complaint.

We may share your contact details with event organising platforms to disseminate invitations to TINZ events.

Unless you ask us not to, we may contact you via email to inform you about changes to this privacy policy, provide our newsletter, inform you about events, inform members about member opportunities, voting and consultation, and convey news related to our anti-corruption mission.

You may opt out of receiving these communications at any time by clicking 'unsubscribe' at the bottom of our e-newsletter or by writing to us.

Where Is Your Information Stored?

We take steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Personal information is stored on password-protected, specific user permitted electronic databases. TINZ has two main databases, maintained by third party cloud-based service providers. This may include the information being stored in servers overseas). We utilize Constant Contact (constantcontact.com) for our bulk email communications. See Constant Contact privacy policy. We use Dropbox for other specific data (recruitment information, personnel lists, some event organising).

TINZ also uses event management, survey tools and membership voting tools. All are password protected, cloud-based services.

TINZ does not have a physical office. All personnel work remotely, using cloud-based services. Unauthorised people do not have access to our cloud-based services.

Service providers providing cloud-based services are only holding the information, or processing it on our behalf, which does not constitute disclosure of information under the Privacy Act.

Please be aware that data transfer via the internet is subject to security risks and, therefore, complete protection against third-party access to transferred data cannot be ensured.

Cookies, Google Analytics

We use "cookies" on our website, transparency.org.nz. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site. Cookies enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is in no way linked to any personally identifiable information on our site. In most cases these are so-called "session cookies" that are deleted once you leave our website.

To an extent, however, these cookies also pass along information used to automatically recognize you. Recognition occurs through an IP address saved to the cookies. The information thereby obtained is used to improve our services and to expedite your access to our website.

You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there.

Google will use this information to evaluate your usage of our site, to compile reports on website activity for us, and to provide other services related to website- and internet usage. Google may also transfer this information to third parties if this is required by law or to the extent this data is processed by third parties on Google's behalf.

Google states that it will in never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

For more information about the disabling option provided by Google, and how to enable this option, visit <https://tools.google.com/dlpage/gaoptout?hl=en>

Server data

For technical reasons, data such as the following, which your internet browser transmits to us or to our web space provider (so called server log files), is collected:

- type and version of the browser you use
- operating system
- websites that linked you to our site (referrer URL)
- websites that you visit
- date and time of your visit
- your Internet Protocol (IP) address.

This anonymous data is stored separately from any personal information you may have provided, thereby making it impossible to connect it to any particular person. The data is used for statistical purposes in order to improve our website and services.

Emails sent via Constant Contact

Transparency International New Zealand (TINZ) uses Constant Contact (constantcontact.com) to send emails. Constant Contact enables TINZ to segment the recipients of emails according to target groups before they are sent. This way, the contents of the emails can be adapted to the respective target group, so that the recipients receive the most relevant contents possible. The analysis following the dispatch is carried out via a so-called web beacon, which establishes a connection to the servers of Constant Contact when the email is opened and transmits various technical information such as the IP address, the browser used, or the operating system used.

This allows us, for example, to track when you opened the email as well as which links you clicked on. The analysis helps TINZ to improve the technical aspects of email dispatch and to adapt the content of the emails even better to your interests and the interests of the readers in general.

Newsletter

Our website transparency.org.nz offers you the opportunity to subscribe to our newsletter, receive updates about anti-corruption issues and information about events we sponsor. The newsletter provides you periodically with information about our services. To receive our newsletter, we require a valid email address.

Optionally, we ask you to provide your name for a personalized newsletter. We will review the email address you provide for the purpose of determining whether you are in fact the owner of the email address provided or whether the actual owner of said address is authorized to receive the newsletter.

When subscribing to our newsletter, we will store your IP address as well as the date and time you subscribed. This serves to protect us in the event a third party improperly and

without your knowledge makes use of your email address to subscribe to our newsletter. You may cancel your subscription to the newsletter at any time. You will find additional details in the email confirming your subscription as well as in each newsletter.

What do we do if we think we may have breached your privacy?

We will:

- Assess if there has been a notifiable breach, and if so, whether it is likely to cause serious harm
- Notify you about the breach, and the Privacy Commissioner if required

We will develop a breach response plan that includes an assessment process

Contacting TINZ

Individuals for whom we have details recorded can ask for a copy of their details at any time and we will generally provide them with access to that information. Individuals can also ask to update and/or alter their details at any time.

Should you have any issues in relation to Transparency International New Zealand and your personal information, you can raise this with our Privacy Officer julie.haggie@tinz.org.nz, who will address your concerns promptly.

For further information about this privacy policy, to access or change your details or, to register an issue in relation to the way TINZ has dealt with your personal information, you may contact the Privacy Officer.

Links to other internet sites

Our website contains links to other sites. Other sites may also have links to our site. Please note that TINZ cannot take responsibility for the content, privacy practices or business practices at these external sites.

Related documents

This policy should be read in conjunction with the TINZ Complaints and Concerns Policy.

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