



## PRIVACY POLICY

### Scope

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All Transdev Wellington (TDW) employees, contractors and subcontractors

### Policy

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Transdev Wellington (TDW) is responsible for managing customer, employee and third-party information to ensure compliance with the Privacy Act 2020.

Transdev Wellington is committed to ensuring the privacy of personal information is protected and TDW strive to uphold the best practice privacy standards in the collection, storage and use of personal information.

This Privacy policy applies to personal information held about individuals and covers;

- Transdev Wellington customers, suppliers and third parties,
- Employees (full time, part time, temporary and casual),
- Independent contractors,
- Third party contractors e.g. consultants.

### Policy Principals

Privacy of information is everyone's responsibility. Be aware of information used and particularly when sending, recording and storing. Specifically, take care when writing and sending e-mails and remember that e-mails are considered a written document. Therefore, they can be required to be produced if they contain personal information that is requested, and if any type of legal action is taken.

The Privacy Act 2020 has 13 principles and outlined below is how Transdev Wellington complies with these principles.

### Personal Information that Transdev Wellington collect

Personal information collected by Transdev Wellington is collected for the purpose of managing customer interactions, supplier, third party and employee relationships.

The personal information Transdev Wellington collect may include:

- name, address and contact details
- date of birth
- gender
- account information
- for employees all employment related information
- for customers information about a service Transdev Wellington provided

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- telephone recordings from third party providers for operational purposes i.e. KiwiRail Train Control
- business contact details and other business information
- credit and financial information and checks, including validation of identity and property ownership
- information about a person's social network profile such as their social network ID, profile picture, gender and location
- the fact that a person has clicked on a 'like' or 'tweet' or similar button on a Transdev Wellington website, app or one of our pages on a social network site, which Transdev Wellington may associate with the details that Transdev Wellington store about a person.

### **How Transdev Wellington collects personal information**

Whenever possible, Transdev Wellington collects personal information directly from the people concerned. Collection occurs when a person interacts, applies for a position or starts work with Transdev Wellington, also during the course of our relationship with the person Transdev Wellington may continue to collect personal information. Information may be collected in various ways, such as mail, internet, telephone, face to face conversation, email, and in various formats, such as forms, letters, electronic file notes and recorded conversations.

### **Being fair about how Transdev Wellington collects personal information**

Transdev Wellington will only collect information in a way that is fair and legal, and will seek not to intrude on an individual's personal situation and affairs in terms of what information is collected and how this is done.

### **Where Transdev Wellington stores personal information**

Transdev Wellington stores customer and employee personal information in a number of locations, including:

- customer and employee documentation is scanned into Transdev Wellington's computer systems, programmes, databases and digital archives
- physical paperwork is filed in a secure location
- electronic files are stored securely with third party cloud hosting providers. These storage mechanisms may be managed internally by Transdev Wellington and held locally in New Zealand, or they could be managed by a third party storage provider with whom Transdev Wellington has a contractual relationship and be held on a server locally or overseas.

### **Transdev Wellington Security Storage Procedures**

Transdev Wellington will take all reasonable steps to store and ensure the security of personal information safeguarding against loss, interference, unauthorised access, modification, misuse and disclosure, such as:



- limiting physical access to Transdev Wellingtons premises,
- limiting access to personal information to those who specifically need it to conduct their business responsibilities,
- requiring our third party providers to have acceptable security measures and protocols to keep personal information secure,
- putting in place physical, electronic, and procedural safeguards in line with industry standards,
- destroying personal information pursuant to the law and our policies,
- subjecting all Transdev Wellington ICT devices and storage to continuous monitoring, logging analysis and audit. Transdev Wellington may choose to contract a third party to perform those functions,
- regularly reviewing and updating security systems to maintain the integrity of the Transdev Wellington security position.

Transdev Wellington cannot guarantee, despite our best efforts, that a person's personal information cannot be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur.

### **Keeping personal information complete, up to date and accurate before Transdev Wellington use it**

Transdev Wellington will not use any personal information about our customers or employees without taking reasonable steps to ensure that the information is up to date, complete, relevant and not misleading.

### **How long Transdev Wellington can keep personal information**

Transdev Wellington will keep personal information about customers or employees for as long as they continue to hold that relationship with Transdev Wellington. Thereafter, personal information will not be used after seven years of the termination of the relationship, unless required by law.

### **What Transdev Wellington can use personal information for**

Personal information will be used by Transdev Wellington in association with interactions between Transdev Wellington and the customer or an employee including to:

- identify a person when they telephone Transdev Wellington to make an enquiry. For example, Transdev Wellington may ask for their date of birth so that Transdev Wellington can avoid disclosing information to an incorrect person
- help prevent or detect fraud or loss
- consider employing a person if they contact Transdev Wellington via the TDW job application website
- manage employee information, including using it for human resources, payroll and health and safety matters.



## When Transdev Wellington can disclose personal information

Transdev Wellington will not give personal information to a third party unless:

- it is one of the purposes for which the information has been obtained,
- it is disclosure to a person authorised by the customer or employee,
- it is necessary to prevent a serious or imminent threat to public health or safety,
- it is authorised by the Privacy Commissioner,
- it is requested by a government agency such as the IRD
- the personal information is publicly available,
- it is necessary to avoid prejudice to the maintenance of law,
- the information will not be used in a form which identifies a person.

In general, Transdev Wellington does not disclose information about a person to third parties without their consent. However, there are exceptions. Transdev Wellington may disclose a person's relevant personal information to third party service providers so that they can provide certain contracted services to Transdev Wellington, such as IT support or programming, hosting services, telephony services, delivering packages, mailing or sending of documents to a person electronically or otherwise and providing fraud checking services.

## Allowing the person who is the subject of the information to access personal information

Any individual is entitled to confirmation from Transdev Wellington as to whether it holds personal information and are entitled to request a copy of that personal information, which will be provided within 20 working days if it is readily retrievable.

To protect the privacy of its customers, Transdev Wellington will verify a customer is who they say they are before Transdev Wellington provide access to or change information.

Any requests made by an agent on a person's behalf (such as a lawyer or broker) must be accompanied by a written authority from the person authorising that particular agent to act on their behalf.

Any requests from outside of Transdev Wellington or from Transdev Wellington employees for access to personal information should be made to the Transdev Wellington Privacy Officer, Mike Frawley.

The Privacy Act outlines circumstances under which Transdev Wellington may refuse to allow a person access to some or all of their personal information. In such cases, Transdev Wellington will give them a reason for its decision.

## Correcting personal information

Individuals have the right to request access to personal information Transdev Wellington holds about them, and request Transdev Wellington to correct any inaccurate, out-of-date,



incomplete, irrelevant or misleading personal information.

### **Assigning a Unique Identifier**

A “unique identifier” is a tag that does not use the individual’s name. Transdev Wellington will only assign a unique identifier, e.g. a customer number or employee number, if this is necessary to enable Transdev Wellington to carry out its functions effectively.

### **Sending information overseas**

Transdev Wellington may, from time to time, send or store information overseas. This may be because the Transdev Group require certain information to be provided. Any overseas organisation that is receiving information from New Zealand is subject to the same standards of privacy that apply in New Zealand, and there is agreement to adequately protect the information sent. Transdev Wellington will ensure, as much as possible, that if any information is sent or stored overseas, it will be adequately protected. If there is any doubt, the person must be expressly informed that their information may not be given the same protection as provided in New Zealand.

### **Clarification of Policy**

Further clarification of this policy can be obtained from the People and Culture team or the Privacy Officer, Mike Frawley.

### **Breaches of the Policy**

If a person wants to report a suspected breach of their privacy or they do not agree with a decision regarding access to their personal information, please contact the Transdev Wellington Privacy Officer who is currently Mike Frawley, Contracts Manager [mike.frawley@transdevnz.co.nz](mailto:mike.frawley@transdevnz.co.nz). TDW expects any enquires or complaints made directly to Transdev Wellington managers will be dealt with fairly and promptly.

However, if the person remains dissatisfied, they can also contact the office of the Privacy Commissioner phone toll free 0800 80 39 09.