Eastern & Central Community Trust	Privacy Policy	
Section	Policy Manual	
Version/Date	1.0	
Purpose	The Privacy Policy guides Eastern & Central Community Trust's regarding best practice surrounding the collection, use, storage and disclosure of information.	
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## **Policy Objectives**

At Eastern & Central Community Trust (ECCT), we are committed to ensuring the privacy of personal information.

From time to time, we may collect, retain and use personal information (including but not limited to, an individual's name, email address, phone number and mailing address).

This Privacy Policy sets out our practices regarding the collection, storage, disclosure and use of your personal information in compliance with the Privacy Act 2020.

This Privacy Policy will be available on our website and individuals that submit personal information via the ECCT website agree to be bound by the terms of this Privacy Policy.

This policy must be read in conjunction with other Trust policies.

## Principles

The Privacy Act 2020 informs how organisations and businesses collect, store, use and share personal information. ECCT has to follow the Privacy Commissioner | Te Mana Mātāpono Matatapu Principles<sup>1</sup>. There are 13 principles in total, and they govern how organisations and business can collect use and share information.

The 13 Privacy Principles are:

- Principle 1: Purpose for collection
- Principle 2: Source of personal information collection from the individual
- Principle 3: Collection of information from subject what to tell the individual
- Principle 4: Manner of collection
- Principle 5: Storage and security of information
- Principle 6: Access to personal information
- Principle 7: Correction of personal information
- Principle 8: Accuracy of personal information
- Principle 9: Retention of personal information
- Principle 10: Limits on the use of personal information
- Principle 11: Disclosure of personal information
- Principle 12: Disclosure outside New Zealand
- Principle 13: Unique identifiers

## Terminology

In this Privacy Policy, the terms **ECCT**, **we**, **our**, and **us** refer to ECCT and the terms **your** and **you** refer to you as a website user, or applicant.

**Personal information** includes but is not limited to: your name, email address, mailing address, phone number, user name, date of birth, contact preferences, online activity logs related to our website, IP addresses, cookie, device, browser and operating system identifiers, internet tags, location and navigational data provided by your connection, server addresses, top-level domain names, dates and times of visits to the website, pages accessed and documents downloaded, interactions with tools and advertising, previous websites visited, and the type of browser used.

<sup>&</sup>lt;sup>1</sup> Privacy Commissioner| Te Mana Mātāpono Matatapu (2024) <u>https://www.privacy.org.nz/privacy-act-2020/privacy-principles/</u>

## Collection and Storage of Personal Information

We may collect and store your personal information in the following circumstances:

- 1. When you voluntarily provide information to us, for example:
  - a. When you complete forms on the ECCT website (including registration forms, application forms and other forms);
  - b. When you create, modify, or use any accounts or registered user facilities available through the ECCT website; or
  - c. When you submit questions, comments or other communications to us.
  - 2. As you navigate through the website, certain information may be passively collected (that is, gathered without your active participation) using various technologies and means, including technical information and usage information individual to you.

## Use of Personal Information

The personal information we collect will be used to provide services you have authorised or requested.

We may also use personal information collected by us to:

- 1. Verify your identity and assist you in case you forget your password or login details;
- 2. Respond to any requests or correspondence from you;
- 3. Manage and improve this website and any related services;
- 4. Carry out internal research and development;
- 5. Provide you with information about a service that you are using (including critical updates and announcements);
- 6. Reduce the need for you to repeatedly enter the same information;
- 7. Customise the ECCT website to suit your particular preferences and interests;
- 8. Where you create a message using the ECCT website (for the purpose of sending that message to us, or to any other recipient specified by you), send that message;
- 9. Analyse website usage, trends and statistics;
- 10. With your permission, supply you with further information concerning products and services which may be of interest to you; or
- 11. Carry out any other use that is authorised by you or is notified to you at the time of collection.

## Disclosure of Personal Information

We will not disclose your personal information except in accordance with this Privacy Policy (and in accordance with the Privacy Act 2020).

We may use or disclose your personal information if you have authorised us to do so, or in any of the following circumstances:

- 1. Where disclosure is connected to the purpose for which it was collected, for example, in an online application;
- 2. Where we have given you notification of the intended use or disclosure and you have not objected to that use or disclosure;
- 3. We believe that the use or disclosure is reasonably necessary to assist a law enforcement agency or an agency responsible for national security in the performance of their functions;

- 4. We believe that the use or disclosure is reasonably necessary to enforce any legal rights we may have, or is reasonably necessary to protect the rights, property and safety of you, us, or others; or
- 5. We are required or permitted by law to disclose the information

Please also note that ECCT may share the information we collect in an anonymous form, for example from surveying or tracking information, with advertisers or other third party partners. However, we will not sell or disclose personal information about you as an individual to any third party or entity outside of ECCT or its related entities for marketing purposes.

## **Online Funding Application**

ECCT only accepts online grant application requests and provides this facility through FLUXX.

FLUXX requires every organisation that uses their services to have their own Privacy Policy that is compliant with the laws in which the organisation is based.

The online application process begins with an online registration. Each individual will need an individual registration for their organisation. On receipt of your registration request we will confirm your username and password and activate your account. You should keep this information safe and not disclose it. If you require assistance with your account, then contact the ECCT office. Disclosure of your password to the staff member is not required.

FLUXX also has a Privacy Policy which can be viewed at: https://www.fluxx.io/privacy-policy

## **Third Party Websites**

This website may contain hyperlinks to third party websites, for example for the purposes of advertising. We are not responsible, and nor do we endorse, any of the content on such websites, or the manner in which those websites collect, store, use, and distribute any personal information you provide.

When visiting a third party website from the hyperlinks displayed on this website, we encourage you to review the privacy statements of those websites so that you can understand how the personal information you provide there may be collected, stored, used and distributed.

These websites may also use cookies to anonymously track, and target advertising based on your behaviour.

## Storage of Personal Information

Your personal information is collected by ECCT and may be held by ECCT (207 Nelson Street South, CBD, Hastings, 4122).

In accordance with the Privacy Act 2020, ECCT may store your personal information for as long as it may lawfully be used by ECCT.

## Security

No data transmissions over the internet are completely secure. Accordingly, we cannot ensure the security of information transmitted from or to you. However, once we have received your personal information, we will use reasonable efforts to protect the information against loss or misuse, and against unauthorised access, use, modification, or disclosure.

## Ideas, Suggestions and Commentary Property of ECCT

By using this website, you agree that any ideas, suggestions or comments you provide to ECCT through this website will be treated as non-confidential and non-proprietary to you.

Such ideas, suggestions, and comments will become the exclusive property of us and may be used by us in whole or in part in any matter whatsoever without notice or compensation to you.

## Right to Access and Correct Your Personal Information

You have the right to access or correct any personal information ECCT holds about you. You can do so by:

- Calling us on: 0800 878 720
- Emailing us at: <u>info@ecct.org.nz</u>
- Writing to us at: The Privacy Officer, Eastern & Central Community Trust, PO Box 1058, Hastings 4156

Whichever way you make your request, we must take steps to ensure that you are authorised to do so. Please understand that we must do this in order to protect your privacy.

The Privacy Act 2020 permits us to withhold personal information from you in certain circumstances, such as where the information is commercially sensitive or legally privileged. We might also refuse to provide you with information that is also about other people if we think this would be unwarranted. If we withhold information from you, we will tell you why.

We are required by the Privacy Act 2020 to decide on your request – and convey this to you – within 20 working days. Where we cannot decide within 20 working days, we will let you know and explain why.

## Changes to Our Privacy Policy

We reserve the right, at our discretion, to update, change or revise this Privacy Policy at any time.

Changes to this Privacy Policy will take effect immediately once they are published on this website.

Please check the Privacy Policy periodically for changes. Your continued use of this website or our services following the posting of any changes to the Privacy Policy indicates your acceptance of those changes.