

Privacy Policy



1 June 2022

 **Westland Milk Products**
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Purpose

The purpose of this Policy and of the Privacy Act 2020 ('Act') is to promote and protect individual privacy by:

- (a) providing a framework for protecting an individual's right to privacy of personal information, including the right of an individual to access their personal information, while recognising that other rights and interests may at times also need to be considered; and
- (b) giving effect to internationally recognised privacy obligations and standards in relation to the privacy of personal information.

Westland is an agency in terms of the Act which collects, holds, and uses personal information. It must do so in accordance with the Information Privacy Principles set out in the Act. These include obligations to:

- Collect, use and retain only that information about the person which is required for a lawful purpose.
- Ensure reasonable protection of the information.
- Not disclose the information to any third party unless permitted.

Policy Statement

This policy is intended to describe the general obligations of Westland, its employees and management for compliance under the Act and provide guiding principles to follow to avoid or deal with a possible breach of Privacy.

Scope

This Policy applies to all employees in the conduct of their business in and for Westland in relation to the collection, use and protection of private information.

Preventing, managing, and reporting privacy breaches

A privacy, or data breach is the unauthorised or accidental access to, or disclosure, alteration, loss or destruction of personal information.

This breach may be accidental or intentional. It includes the prevention of access to a person's own personal information.

Westland takes privacy breaches very seriously, whether the breach affects one or many people.

Personal information may include:

Any information about the identified person. It does not need to be confidential or secret information. This includes information about a person's:

- Name, address or phone number.
- Health records.
- Passports or licenses.
- Financial information.
- Criminal history.

Where there is a breach Westland believes on reasonable grounds that has or is likely to cause serious

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harm, the Act requires Westland to inform the Office of the Privacy Commissioner and all affected individuals. Failure to do so is an offence.

Serious harm may include:

- This harm could range from specific damage (financial loss, loss of employment or physical injury).
- Loss of benefits (individual rights, benefits, privileges, obligation or interests).
- Emotional harm (significant humiliation, loss of dignity or injury to feelings).

Possible breaches

If employees believe their privacy has been breached, we encourage them to make immediate contact with the Privacy Officer who will investigate the claim.

Access to personal information

Employees may request access to, or correction of, their personal information verbally or in writing. Written requests should be made to the Privacy Officer. Access to information held by Westland about them, including their own wage and time records, holiday and leave records will be permitted. The Act permits withholding private information in certain circumstances.

Guiding Principles for Compliance

1. Avoid the problem - Prevent privacy breaches – use a **P.A.D.L.O.C.K.**

PURPOSE

Have a clear purpose and need for collecting personal data.

ACCURACY

Personal information should be accurate and kept up to date. Act quickly if an email is sent to a wrong address. Send a follow up email asking the recipient not to open it and alert your manager and Privacy Officer.

DATA MINIMIZATION

Collect only what you need; keep only what you need. Once finished with personal information, dispose of it securely, both electronically and physically.

LIFECYCLE

Review the lifecycle of collection, use and disposal of information in your care.

OPENNESS

Be open about how information is being used. Communicate clear policies regarding computer usage. Continually remind employees of the correct use of work devices and set boundaries.

CONTROL

Lock sensitive files and devices in secure cabinets. Use strong passwords for electronic devices, including all work phones, laptops, portable hard drives and USB sticks.

KNOWLEDGE

Inform people why information is being collected, how it is to be used. Be aware of phishing and maintain the security of Westland's IT network.

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2. Respond immediately to a possible privacy breach

Step one: Contain the breach

Step two: Assess the breach

Assessing the risks of the privacy breach will help determine the next steps. This requires considering the types of information involved, what the personal information may show, the cause of the breach and the extent of it.

Also consider the potential harm that could come from the breach and offer support to any people affected.

Step three: Notify

If a privacy breach creates a risk of harm to someone, Westland should notify them. Notifying them promptly allows them to take steps to protect themselves and regain control of their information as soon as possible.

Do not notify people unless sure that the breach has compromised their personal information, as notifying the wrong person in error, or where there is no risk of serious harm being caused by the breach could cause unintentional damage.

If the breach has caused serious harm, or is likely to cause serious harm, the law requires notification to the Privacy Commissioner within a reasonable timeframe.

Step Four: Prevent

Effective prevention against personal information breaches is to plan for security of all personal information.

Investigate the cause of any past or potential breach and update prevention plans.

Continually review Westland's policies to enable minimising the retention of personal information.

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Schedule A

The Twelve Principles

The following are the twelve privacy principles defined in the legislative requirements with regards to collecting, holding and disclosing personal information about a person:

- **Purpose** – personal information must only be collected for a lawful purpose, but connected and necessary to the business of Westland.
- **Source** – If not publicly available, or authorised by the person it is about, then the personal information must be collected directly from that person, together with permission for its use.
- **Collection** – The person must be made aware of the reason the information is required. This includes the fact that information is being collected, the purpose to which it will be put, the intended recipients, the consequences of refusal and the rights of access to and correction of that personal information.
- **Manner of Collection** – Collection must be by lawful, fair and unobtrusive means.
- **Storage and Security** – Personal information must be safeguarded against loss or unauthorized access, use, modification or disclosure.
- **Access** – Personal information must be accessible to the person concerned (some exclusions may apply).
- **Correction** – The person is entitled to request correction of personal information.
- **Accuracy** – Personal information must be checked for accuracy before use. It must not only be accurate but up to date, complete, relevant and not misleading.
- **Retention** – Personal information must not be kept for longer than necessary.
- **Limits on Use** – Personal information collected for one purpose must not be used for another purpose.
- **Limits on Disclosure** – Personal information may only be disclosed to other parties in certain limited and clearly defined circumstances.
- **Unique Identifiers** – (other than the person's name) are permitted in limited circumstances.