

# Privacy Notice

Last Updated: January 2023

Zephyr Consulting Limited (“Zephyr”) is committed to protecting the privacy of the individuals we encounter in conducting our business. “Personal Information” is information that identifies and relates to you or other individuals. This Privacy Policy describes how we handle Personal Information that we collect both through this website (the “Site”) and through other means (for example, from application forms, telephone calls, emails, meetings, and other communications with us, or other third parties involved in our business dealings with you).

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### 1. Who to contact about personal information

If you have any questions about our use of your Personal Information you can write to:

The Managing Director  
Zephyr Consulting Limited  
PO Box 11265  
Wellington

## 2. Personal Information we collect

Depending on your relationship with us (for example, as a Consultant or Client), Personal Information collected about you may in certain circumstances include:

### **General identification and contact information**

Your name; address; e-mail and telephone details; gender; marital status; family status; family members; date of birth; educational background; photos; employment history, skills, and experience; professional licences, certifications, and affiliations.

### **Identification documents/numbers issued by government bodies and agencies**

Your passport number; tax identification number, driver's or other licence number, birth certificate, residency/work status.

### **Financial information and account details**

Remuneration, employment status, bank account details.

### **Sensitive information**

Current or former physical, mental, or medical condition; health status; injury or disability that may require special services/facilities or may impact upon your work. Criminal record or civil litigation history.

## 3. Uses of Personal Information

We will only use your Personal Information for the purpose for which it is obtained, subject to certain exceptions set out in the Privacy Act 2020. Depending on the purpose for which the Personal Information was obtained and on the specific circumstances, we may use your Personal Information to:

- Communicate with you and others as part of our business.
- Send you important information regarding changes to our policies, other terms and conditions, the Site and other administrative information.
- Make decisions about whether to provide services to you or the organisation you represent.
- Make decisions about whether to engage/employ you within Zephyr.
- Prevent, detect, and investigate crime, including fraud, and analyse and manage other commercial risks.
- Carry out market research and analysis, including satisfaction surveys.
- Provide marketing information to you (including information about other products and services offered by selected third-party partners)
- Send newsletters and other company material in accordance with preferences you have expressed.

- Personalise your experience on the Site by presenting information and advertisements tailored to you.
- Identify you to anyone to whom you send messages through the Site.
- Allow you to participate in contests, prize draws and similar promotions, and to administer these activities. Some of these activities have additional terms and conditions, which could contain additional information about how we use and disclose your Personal Information.
- Manage our infrastructure and business operations, and comply with internal policies and procedures, including those relating to auditing; finance and accounting; billing and collections; IT systems; data and website hosting; business continuity; and records, document, and print management.
- Resolve complaints, and handle requests for data access or correction.
- Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence).
- Establish and defend legal rights; protect our operations or those of any of our associate companies or business partners and pursue available remedies or limit our damages.

#### 4. Sharing of Personal Information

Subject to continuing to comply with the requirements of the Privacy Act 2020, Zephyr may make Personal Information available to:

##### **Our Clients**

In the course of marketing and providing services to clients, Zephyr may make personal information available to third parties such as government bodies, agencies and private companies. In all cases we will attempt to inform you where your personal information is being provided prior to this occurring. On rare occasions this may not be possible for expediency and maximising the opportunity of acquiring a role.

##### **Our Consultants**

In the course of managing the Zephyr team, we may make personal information of both Clients and Consultants available to other personnel within the Zephyr team.

##### **Marketers, Consultancies and Recruitment Agencies**

We do not share your personal information with other marketers, consultancies, or recruitment agencies unless we have asked for and obtained

your explicit consent. If you do not provide consent, we will not share your information with these types of organisations.

### **Government authorities and third parties involved in court action**

Zephyr may also share Personal Information with governmental or other public authorities (including, but not limited to, workers' compensation boards, courts, law enforcement, tax authorities and criminal investigations agencies); and third-party civil legal process participants and their accountants, auditors, lawyers and other advisors and representatives as we believe to be necessary or appropriate:

- (a) to comply with applicable law, including laws outside your country of residence;
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions;
- (e) to protect our operations or those of any of our associated companies;
- (f) to protect our rights, privacy, safety or property, and/or that of our associated companies; and
- (g) to allow us to pursue available remedies or limit our damage

### **Other third parties**

Zephyr may also share Personal Information with purchasers and prospective purchasers or parties in any actual or proposed reorganisation, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portions of our business, assets or stock.

Personal Information may also be shared by you, on message boards, chat, profile pages and blogs, and other services on the Site to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public information, and may be available to visitors to the Site and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on the Site.

## **5. Security**

Zephyr will take such necessary measures required to keep your Personal Information secure, as required to comply with the Information Privacy Principles under the Privacy Act 2020. If you have reason to believe that your

interaction with us is no longer secure (for example, if you feel that the security of any Personal Information you might have with us has been compromised), please immediately notify us.

All Personal Information collected by Zephyr, not just sensitive information, has restricted access within our offices. Only employees who need access to the information to perform their specific role are granted access to personally identifiable information.

Servers that store personal information are kept in a secure environment as are office files.

## 6. Other Information we collect

We and our third-party service providers may collect Other Information in a variety of ways, including:

### **Through your internet browser:**

Certain information is collected by most websites, such as your IP address (i.e., your computer's address on the internet), screen resolution, operating system type (Windows or Mac) and version, internet browser type and version, time of the visit and the page(s) visited. We use this information for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site.

### **Using cookies:**

Cookies are pieces of information stored directly on the computer you are using. Cookies allow us to recognise your computer and to collect information such as internet browser type, time spent on the Site, pages visited and language preferences. We may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalise your experience while visiting the Site, or to gather statistical information about the usage of the Site.

### **Using pixel tags, web beacons, clear GIFs or other similar technologies:**

These may be used in connection with some Site pages and HTML-formatted e-mail messages to, among other things, track the actions of Site users and e-mail recipients, measure the success of our marketing campaigns and compile statistics about Site usage and response rates.

### **From you:**

Some information (for example, your location or preferred means of communication) is collected when you voluntarily provide it. Unless combined with Personal Information, this information does not personally identify you.

**By aggregating information:**

We may aggregate and use certain information (for example, we may aggregate information to calculate the percentage of our users who have a particular telephone area code).

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then, in addition to the uses listed in the "Other Information We Collect" section above, we may use and disclose Other Information for all the purposes for which we use and disclose Personal Information.

**7. Links and Third Party Websites**

The Site contains links to other websites. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site to which this Site contains a link. The inclusion of a link on the Site does not imply endorsement of the linked site by us or by our associated companies. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every web site that collects personally identifiable information.