

Wenita Forest Products Limited (WFP)

EXTERNAL PRIVACY POLICY

1. Purpose

Wenita Forest Products Limited (**WFP**) collects and processes Personal Information primarily for the purposes of supporting its relationship with the individual and providing goods and/or services requested, including processing entry permits that may have been submitted.

This policy covers how WFP manages the Personal Information of parties external to the company, that is provided to WFP via the WFP website or by other external means.

2. Policy Objective

WFP takes its responsibilities under the Privacy Act 2020 seriously and has strict controls around how it collects and manages Personal Information.

This External Privacy Policy applies to people who are not employees, potential employees, directors or contractors of WFP. By providing Personal Information, using the Website or utilising services, or entering into a formal arrangement with WFP, each individual agrees to this External Privacy Policy. This External Privacy Policy applies to all WFP activities and to all products and services offered by WFP.

This External Privacy Policy may change at any time and WFP will notify changes by posting an updated policy on the Website.

3. Definitions

Contractor: An independent contractor of WFP.

Personal Information: has the meaning given to that term in the Privacy Act and means information about an identifiable individual.

Potential Employee: an individual who has expressed interest in working for WFP or has applied for a role with WFP.

Privacy Act: means the New Zealand Privacy Act 2020.

Website: means the WFP website at www.wenita.co.nz or at access.wenita.co.nz.

4. Procedures

4.1 Collecting Personal Information

- WFP collects Personal Information from a wide variety of sources including, but not limited to, contract tenders, access permits, stakeholder surveys, sale and purchase agreements, and supply agreements.
- WFP may collect:
 - a. name, contact details, date of birth and other contact information;
 - b. type, status and details of any drivers' licence and firearms licence;
 - c. IP address, device ID, memory information, browser type and version, connection speed, network information, geographical location, device identifiers, cookie identifiers and number of visits to the Website;
 - d. billing and address information;
 - e. electronic, written or verbal interactions with WFP staff, agents or other persons;
 - f. product and service preferences; and
 - g. any other information that is reasonably necessary for us to run our business and provide our services.
- WFP may collect Personal Information about an individual from:
 - The individual directly, when the individual provides that Personal Information to WFP, including via the Website and any related service, through any registration or subscription process, through any contact with WFP (e.g. telephone call or email), or when the individual purchases or uses our services and products.
 - Third parties, where this has been authorised, or the information is publicly available.
 - From government departments or law enforcement agencies (where required).
- Where practical, WFP will collect Personal Information from the individual directly. Where WFP receives Personal Information about an individual from a third party, WFP will process that information in accordance with this External Privacy Policy.
- WFP also uses cookies and similar technologies to track the activity on the Website, hold certain information and enable efficient navigation of the Website. Any individual may disable cookies by changing the settings on their browser, although this may mean that they cannot use all of the features of the Website.
- Where an individual chooses not to provide required Personal Information, WFP may not be able to respond to that individual's requests or provide that individual with services/products.

4.2 Using Personal Information

WFP will primarily use Personal Information for the purposes outlined above at Section 1 (Purpose).

However, WFP may also use Personal Information to:

- Verify the identity of an individual,
- Provide services and products to an individual or business,
- Market its services and products, including by electronic means (e.g. by text or email for this purpose),
- Improve its services and products,
- Undertake credit checks (if necessary),
- Invoice and collect money that is owed,
- Respond to communications, complaints or requests from governmental authorities,

- Ensure the health and safety of any person, and assist individuals in the event of an emergency,
- Protect and/or enforce its legal rights and interests, including defending any claim,
- Generate statistical information and reports on WFP's business, services and products,
- Comply with applicable legal requirements, industry standards and WFP policies, and
- Carry out any other purpose authorised by the individual or the Privacy Act.

WFP may use Personal Information for additional purposes related to the purposes listed above, where it reasonably believes that the purpose for which the information is to be used is directly related to the purpose in connection with which the information was obtained, or where an exception under the Privacy Act applies.

4.3 Disclosing Personal Information

WFP may share Personal Information with its staff, related companies, advisers or third parties, however Personal Information will only be shared with WFP personnel if it is necessary for them to carry out their work for WFP and to meet a request for goods and services, or where an exception under the Privacy Act applies.

WFP may disclose Personal Information:

- To third parties who assist and enable WFP to use Personal Information to support delivery of its services including:
 - Agencies used to conduct assessments consistent with WFP's Drug and Alcohol policy and Health and Safety Management.
- To regulators, law enforcement bodies, government agencies, courts or other third parties where:
 - WFP reasonably believes disclosure is necessary or appropriate to prevent physical harm or financial loss or to investigate suspected fraudulent or illegal activity; or
 - it is necessary to comply with any applicable law or regulation, or to exercise, establish or defend WFP's legal rights;
- Where the disclosure is otherwise required by law or in order to protect the individual's vital interests or the vital interests of another person.

WFP reserves the right to disclose Personal Information held about an individual if WFP sells or transfers, or in order to facilitate the sale or transfer of, all or a portion of the WFP business or assets or subsidiaries or related companies. Should such a sale or transfer occur, WFP will use reasonable efforts to direct the transferee to use Personal Information in a manner that is consistent with this Privacy Policy. Following such a sale or transfer, any individual may contact the entity to which WFP transferred Personal Information with any enquiries concerning the handling of their information.

An individual's personal information may be disclosed offshore where this is necessary for WFP to run its business and provide its services. For example, WFP may use third party data managers based here or overseas (such as cloud-based database companies). However, an individual's personal information will only be disclosed offshore where WFP reasonably believes the protections that apply to that information will be as good as the protection that applies in New Zealand, or where WFP obtains the individual's express permission.

WFP will not disclose personal information to any other agency or to any other person unless WFP believes on reasonable grounds that the disclosure of the information is one of the purposes in

connection with which the information was obtained or is directly related to one of those purposes, or if WFP believes another exception under the Privacy Act 2020 or this External Privacy Policy applies.

4.4 Protecting Information

- WFP will take reasonable steps to keep Personal Information safe from loss, unauthorised activity, or other misuse.
- While WFP takes reasonable steps to maintain secure internet connections, if Personal Information is provided to WFP over the internet, the provision of that information is at the individual's own risk.
- If an individual follows a link on the Website to another site, the owner of that site will have its own privacy policy relating to Personal Information. We suggest the individual reviews that site's privacy policy before providing Personal Information.
- Where WFP no longer requires Personal Information for the reasons outlined above, WFP will destroy, delete, or permanently anonymise it.

4.5 Individual Rights

WFP will take reasonable steps to ensure that Personal Information collected and held is accurate, complete and up to date. WFP relies on individuals to advise of any changes to their Personal Information to help to maintain accurate, complete and up to date information.

WFP will make Personal Information held about individuals available to them upon request and in accordance with the Privacy Act. The Privacy Act describes the conditions under which some personal information may be withheld. Individuals also have the right to request correction of personal information held in accordance with the provisions of the Privacy Act.

Queries in relation to access to or correction of Personal Information can be made by contacting WFP's Privacy Officer (Kate Rankin, kate.rankin@wenita.co.nz).

4.6 How A Privacy Complaint Can Be Made

Complaints about a breach or potential breach of this Privacy Policy can be made by contacting WFP's Privacy Officer (Kate Rankin, kate.rankin@wenita.co.nz).

If WFP does not resolve the complaint to the complainant's satisfaction, the complainant may apply to the Privacy Commissioner (www.privacy.org.nz) to have the complaint investigated. For more information on how to lodge a complaint with the Privacy Commissioner, please contact the Commissioner on 04-474-7590 or at <https://www.privacy.org.nz/about-us/contact/>.

WFP will notify an individual as soon as practicable if there is a privacy breach in relation to their Personal Information that WFP believes has caused or is likely to cause them serious harm, unless one of the exceptions under the Privacy Act applies. WFP will also notify the Privacy Commissioner as soon as practicable if there is such a breach.

If you have any questions in relation to this policy, please contact WFP's Privacy Officer (Kate Rankin, kate.rankin@wenita.co.nz).

5. Related Documents

New Zealand Privacy Act 2020	https://www.legislation.govt.nz/act/public/2020/0031/latest/LMS23223.html
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6. Review date

The External Privacy Policy will be reviewed by the Board every two years or as required.

7. Approval

This Policy has been reviewed and approved by the Board of Wenita Forest Products Limited on 13 February 2023.

Due for review no later than 10 November 2024.


Matt Crapp (Feb 23, 2023 09:05 GMT+11)

Matt Crapp
Director / Chair
Date
Feb 23, 2023