

MOORE WILSON'S PRIVACY POLICY

CUSTOMER AND OTHERS PERSONAL INFORMATION

March 2021

Introduction

This policy sets out how Moore Wilson's stores, collects, uses and discloses personal information and other data about Moore Wilson's customers and any other individuals we may deal with from time to time.

It is important for all Moore Wilson's employees to comply with this policy when collecting, storing, using and sharing the personal information of any client or other person in the course of their work. Please also refer to the *Moore Wilson's Employee Privacy Policy*, which sets out the rules that apply to the collection, storage, use and disclosure of personal information belonging to other Moore Wilson employees.

Moore Wilson's is committed to creating an environment of trust, care and respect for legal requirements (under the Privacy Act 2020) when it comes to the collection, use and management of personal information. This Policy outlines the processes for managing the personal information of clients and other people so that their rights to privacy are always respected and protected.

Personal information means information about an identifiable individual. As such it does not include information about a company or other incorporated legal person. For this reason, Moore Wilson's will inevitably also collect personal information from customer representatives and others related to business (i.e. where the client itself is a company that does not have any privacy rights).

This policy does not limit or exclude anyone's rights under the Privacy Act. Further information on the Act can be found at www.privacy.org.nz.

Moore Wilson's Approach to Privacy

When Moore Wilson's collects, stores and uses personal information about its employees and customers it will always adhere to the following privacy principles to ensure that personal information is treated with respect and in a legally compliant manner:

- **Data minimisation** – we will only collect, create and retain personal information that we really need (i.e. reasonably require) for the purpose of carrying out legitimate business activities and functions.
- **Transparency** – we will always be open and up front with our employees and customers about the personal information we collect as well as how we may use, store and disclose it.
- **Security** – we will always take all reasonable steps (as determined by the nature of the personal information in question) to ensure that personal information is adequately protected against loss and unauthorised access, use and disclosure.
- **Use limitation** – we will only ever use and share personal information (be it within Moore Wilson's or with external people) in ways we say we will or otherwise agreed with the person the information is about, and only where necessary to meet our lawful purposes (e.g. as a service provider in relation to client information and an employer in the case of employee information).
- **Rights focused** – we will make sure that our people can exercise their important privacy rights, including the right to know in advance and consent to how their personal information is used and shared as well as the right to access and correct their information when they wish to.

Every time we are required to collect, use, disclose or otherwise deal with any personal information, we will always consider and comply with each of the above key privacy concepts.

How do we Collect Personal Information about Customers?

When Moore Wilson's is engaged by a customer to join Moore Wilson's Loyalty Programme or set up an account, we will need to collect a range of personal information from:

- **Them directly**, from the information supplied on application forms .
- **Third parties**, for example, your referees and as part of any credit check or related search.

Personal information about customers and others will often also be generated over the course of each purchase (e.g. frequency of visit, purchase history)

Types of Personal Information we collect about customers and others

While the exact list of information may vary, the types of personal information we may collect include the following:

Personal information we collect from customers and others directly includes:
Contact information (e.g. name, address, email, phone number and similar information)
Work related information (e.g. their employer and job title and information regarding their relevant work-related experience, expertise and like information).
Credit card or other payment, insurance and like information that is reasonably required for billing purposes.
Email and other correspondence (including any file notes made in respect of phone calls and meetings).
Any survey or feedback information that we may collect from time to time, including any information relating to a complaint or dispute.
Any other information that we reasonably require to deliver wholesale, retail and related services.

Personal information we collect from others will include:
Information related to anti-money laundering and/or credit check where this is relevant.
Publicly available information (e.g. available on LinkedIn and other forums including google and other websites) relating to the professional background and expertise of a person whom Moore Wilson's may work with on a given client engagement.
Any other information that we reasonably require to deliver wholesale, retail and related services.

Information relating to Safety and Security
There are CCTV cameras in use across the Moore Wilson premises, we may collect still or video footage of your activities for safety and security purposes. These images may be shared with agencies, law enforcement, third parties or security services if investigation is reasonably required.

How we may use personal information about customers and others

We will only ever use the personal information collect from customers and others to the extent that is reasonably required:

- To enable the proper provision of wholesale, retail and related services.
- To determine, process and administer invoicing and other account related matters.
- To communicate with customers and others about marketing related subject matter and deal with any other inquiries associated with the delivery of our services.
- To ensure the health and safety of any customer or other person whom we are responsible for under the Health and Safety at Work Act 2015.
- To comply with legislative reporting and recordkeeping requirements.

- To conduct benchmarking, analyses and planning activities, including statistical and management reporting, and
- To protect and/or enforce our legal rights and interests, including defending any claim.
- In any other way that is reasonably required as a responsible service provider and permitted by law.

How we may share the personal information of customers and others

As a business and service we will often need to share the personal information of customers and others internally with those who have a legitimate reason or need for accessing this information. For example, personal information provided to Moore Wilson's by a customer will typically need to be shared with those needing to communicate directly with the customer for account matters, selling opportunities or marketing .

It is important that Moore Wilson's only ever shares such personal information internally to the extent that doing so is reasonably required for a legitimate purpose. Where we need to share information in a way we have not anticipated here, we will only do so if required or permitted by law.

Internal people who may have access to the personal information of clients and others include:
Moore Wilson's employees who are allocated to work directly with customers for service or correspondence.
Moore Wilson's support staff who require the information for any ancillary business purpose (e.g. accounts receivable or marketing).
Executive Directors and Senior Leadership Team when deemed necessary.
Contracted service providers that we use to perform services on our behalf (such banking, mailing house services, logistics and IT service providers), within and outside New Zealand (see more below)
Legal advisers or other professional advisers and consultants engaged by Moore Wilson's.

How we store and protect personal information

Moore Wilson's will only retain the personal information of customers and others for as long as it is needed to perform our contractual obligations or meet our legitimate interests, or to comply with our legal obligations, including the requirement to retain information in accordance with the Tax Administration Act, Employment Relations Act and Public Records Act. Moore Wilson's will take all reasonably practicable steps to delete such personal information once it is no longer required for this purpose.

Wherever personal information is stored, we will take reasonable steps to ensure that it is protected against loss or unauthorised access, modification, use or disclosure. All access and use of personal information will be strictly in accordance with the privacy principles noted at the beginning of this Policy and the legal obligations set out in the Privacy Act 2020

Where personal information is particularly sensitive (e.g. it is financial) Moore Wilson's will take additional steps to ensure the information is secure and can only be accessed by those at Moore Wilson's who have a legitimate need to access and use it.

Privacy breach – notification by Moore Wilson's employee or contractor

If any Moore Wilson's employee or contractor becomes aware of an actual or potential privacy breach, they will report this to the Privacy Officer (General Manager) or Managing Director as soon as possible so that Moore Wilson's can respond without delay. This will help minimise any harm caused to the affected people.

A privacy breach could entail leaving documents containing personal information on the bus or entail a large-scale intrusion into Moore Wilson's server. In any scenario where personal information is lost or compromised in any way it will be treated as a privacy breach until proven otherwise.

The Privacy Act 2020 makes it compulsory to report any privacy breaches "that have caused serious harm, or are likely to do so". In the event that a breach of this nature does occur Moore Wilson's will notify the Privacy Commissioner of the privacy breach. If we are unsure as to whether the breach is a serious one, we will contact the Privacy Commissioner and seek guidance.

Regardless of the seriousness of the breach we will always be open and transparent with people about how we are handling their personal information. On this basis, if there is a breach we will always notify the affected individuals promptly so that they can take steps to protect themselves and regain control of their information as soon as possible.

Privacy breach – external notification

If a customer or contact of Moore Wilson's becomes aware of an actual or potential privacy breach, we would appreciate being made aware of the situation as soon as possible so we can act to remedy it as soon as possible. Breaches can be reported to the Moore Wilson's Privacy Officer – taste@moorewilson.co.nz

The Privacy Act 2020 makes it compulsory to report any privacy breaches "that have caused serious harm, or are likely to do so". In the event that a breach of this nature does occur, Moore Wilson's will notify the Privacy Commissioner of the privacy breach. If we are unsure as to whether the breach is a serious one, we will contact the Privacy Commissioner and seek guidance.

If external parties are unhappy with Moore Wilson's remedial actions, or assess the complaint as serious, they can also notify the Privacy Commissioner by completing the online Complaint Form <https://www.privacy.org.nz/your-rights/making-a-complaint/complaint-form/>

Regardless of the seriousness of the breach we will always be open and transparent with people about how we are handling their personal information. On this basis, if there is a breach we will always notify the affected individuals promptly so that they can take steps to protect themselves and regain control of their information as soon as possible.

Accessing and controlling personal information

Everyone has an important range of privacy rights. The rights of customers and others include the following:

<u>The right to request a copy of their personal information and/or know what personal information we hold.</u>
Please note that on some limited occasions we may need to withhold some personal information, for example, where it is legally privileged, concerns information provided to us by another person in confidence or includes personal information about other people. If we need to withhold information, we will tell the relevant person why. We will take careful steps to verify the identity of the person requesting personal information before making any disclosure.
<u>The right to correct any of the personal information we hold about a customer or other person</u>
If a customer or other person thinks any of the personal information, we hold about them is wrong, they can ask us to correct it. If we cannot correct your information - for example, where we don't agree that it's wrong – we will explain why if this is the case. The requesting person can ask us to attach their correction request to the relevant personal information as a statement of correction.
<u>Right to make a complaint</u>
If a customer or other person has any concerns about the way that we have collected, processed or used their personal information we will seek to resolve the matter to their satisfaction. If we are unable to resolve the matter with the person concerned we should always advise them of their right to file a complaint to the Office of the New Zealand Privacy Commissioner by calling the commission or making a complaint via their website: www.privacy.org.nz