



TASMAN ENVIRONMENTAL TRUST

COMMUNICATION

Policy number	5	Version	2
Drafted by	Marios Gavalas	Approved by Board on	11 April 2022
Responsible person	Sky Davies	Scheduled review date	April 2025

INTRODUCTION

Tasman Environmental Trust recognizes the critical role that effective communication plays in achieving its goals.

PURPOSE

This policy is intended to facilitate better communication, ensuring that staff, contractors and volunteers working at Tasman Environmental Trust understand the importance of effective communications to the Trust's work.

SCOPE

This policy covers the Trust Board, Hub and Projects managed by the Tasman Environmental Trust.

POLICY

Tasman Environmental Trust is committed to maintaining open lines of communication both internally and externally. Courtesy, tact and consideration should guide each staff member, volunteer and Trustee in relationships with others in the organisation, with stakeholders/funders and with the public. It is mandatory that each staff member, volunteer and Trustee working for TET show maximum respect to every other person involved with the Trust.

The purpose of communication should be to inform, help and encourage others and to make the Trust run as effectively as possible.

- Courtesy, friendliness, and a spirit of helpfulness are important and guide the Trust's dealings with staff members, volunteers, stakeholders and the public.

- All communications should use plain language with a focus on openness and engagement. Communications should always be relevant, accurate, sensitive and timely. Use the document [Mohua Voice](#) for guidance.
- External communications should build and maintain confidence in the quality of services provided by the Trust, communications should be consistent with the tone and values of the Trust, and develop and sustain positive relationships with key external stakeholders both current and into the future.
- At no time should external communications be a vehicle for the promotion of personal opinion or political agenda. To this end all external communications (with the exception of social media posts, refer to specific social media section below) should be reviewed by the Trust Manager before being sent/published. The Trust Manager can delegate this responsibility to another staff member.
- Differences of opinion should be handled privately and discreetly. Gossip is to be avoided. Communicate directly with the person or persons involved to resolve differences.
- Constructive criticism — that which will improve the functioning of the Trust by clarifying or instructing — should be welcomed when delivered with respect and tact. Destructive criticism — that which is designed to harm the Trust or another person — must not occur. This also applies to Tasman Environmental Trust staff's private social media accounts.
- Employees should strive to maintain a civil and professional work atmosphere at all times.

Copyright

Tasman Environmental Trust is responsible for managing its assets, including its intellectual assets, in a way that maximises their contribution to the goals of the organisation.

Subject to these responsibilities, Tasman Environmental Trust is committed to the widest possible dissemination of its ideas and findings where these may assist others.

Material created by employees of Tasman Environmental Trust in the course of their employment, irrespective of whether it is created using Tasman Environmental Trust facilities or materials, or during normal working hours, will belong to Tasman Environmental Trust. What constitutes the course of employment will be determined by the employee's position description and usual duties.

An employee's employment contract may vary the default position of when copyright belongs to Tasman Environmental Trust. The employment contract overrides the default position that exists at law.

Works by independent contractors and volunteers shall be owned in accordance with the written contract under which the work was created. Tasman Environmental Trust shall ensure that there is a written contract for work by an independent contractor or volunteer specifying

ownership. At law, unless a written contract specifies otherwise then independent contractors and volunteers will own copyright in everything that they create.

Copyright notice

Staff and volunteers of Tasman Environmental Trust should ensure that every publication of Tasman Environmental Trust, including any books, newsletters, brochures, forms, reports and computer software contains the following statement:

© Tasman Environmental Trust, New Zealand, [Year of creation of material]

This statement should not be included in normal business letters, invoices, and receipts.

Use of copyright material

Staff and volunteers of Tasman Environmental Trust are required to observe all applicable copyright laws and regulations.

Staff and volunteers of Tasman Environmental Trust may use copyright material belonging to or licensed to Tasman Environmental Trust only for the purposes of their work for Tasman Environmental Trust. Where the material is used by Tasman Environmental Trust under licence, staff and volunteers must act in accordance with that licence.

Staff and volunteers of Tasman Environmental Trust may not reproduce, publish, distribute or adapt third party copyright material in the course of their work for Tasman Environmental Trust without the authorisation of the copyright owner. Staff and volunteers may not download or reproduce text, photographs or illustrations found on the internet without authorisation of the copyright owner. This includes for use in internal or external newsletters, reports or presentations.

When reproducing or otherwise using third party copyright material, it cannot be assumed that just because something is on the internet that it is free for everybody to copy and use. Acknowledgement of source of the material does not overcome the need for authorisation; actual authorisation is still required.

The Trust Manager is required to institute procedures that will ensure:

- a) that all uses of third-party copyright materials are recorded, and
- b) that all compensable uses of copyright material are appropriately processed.

Moral rights

Where it is reasonable to do so, staff and volunteers of Tasman Environmental Trust should ensure that:

- a) When reproducing any written material, photograph or illustration, the creator should be acknowledged where it is appropriate to do so. It is generally appropriate to acknowledge the author of a report or article in a newsletter, but it is not appropriate to acknowledge the creator of a marketing brochure or promotional flyer, or where it is desirable for operational reasons that correspondence be sent out in the name of somebody else (such as in the name of a director, executive or manager).
- b) When reproducing any written material, photograph or illustration, a person should not be falsely attributed as the creator unless it is reasonable to do so. For example,

some correspondence may need to go out in the name of a director, executive or manager even though it was written by somebody else.

Media Relations

This policy deals with the day-to-day relationship between Tasman Environmental Trust and the media and does not address how the organisation will work with the media in a crisis.

Local, national and international media are vital partners in achieving the goals of Tasman Environmental Trust. In order to maximise the advantages of media presentation and minimise the risks of media misrepresentation it is necessary to establish guidelines for how media contacts will be conducted.

Tasman Environmental Trust should seek to establish and maintain a good and open relationship with the media. It is important that the organisation works with the media to communicate important public information messages about its work and its goals.

It is not the intention of this policy to curb freedom of speech or to enforce strict rules and regulations. Rather, the intention is to establish a framework for achieving an effective working relationship with the media. The organisation welcomes the opportunity to talk to the media and, through them, to debate issues in the public arena.

In dealing with the media, staff, board members and other volunteers should be conscious that they may be seen as representatives of the organisation and should therefore avoid making comments or participating in photo opportunities that may damage the long-term reputation of Tasman Environmental Trust.

Tasman Environmental Trust works with the media in order to

- advocate for the goals of the organisation
- promote the work of the organisation
- inform the public of the details of the organisation
- assist in fundraising for the organisation

In order to ensure that these purposes can be fulfilled, this policy regulates the choice of people entitled to speak for Tasman Environmental Trust.

The media themselves have a vital role to play on behalf of the community in holding Tasman Environmental Trust to account for its policies and actions. It is important that they have access to staff and board members and to background information to assist them in this role.

To balance this, Tasman Environmental Trust must have the capacity to defend itself from any unfounded criticism and will ensure that the public are properly informed of all the relevant facts (if necessary, using other channels of communication).

It is the responsibility of all staff, board members and volunteers to ensure that effective media relations are maintained in order to achieve the aims of Tasman Environmental Trust. Naturally, in doing this, certain legal constraints might apply (e.g., not making comment on current court cases, especially those before a jury).

Tasman Environmental Trust operates on the values of

- **Honesty:** The organisation will never knowingly mislead the public, media or staff on an issue or news story.
- **Transparency:** The organisation will promote openness and accessibility in our dealings with the media, whilst complying with the law and maintaining confidentiality when appropriate.

- **Clarity:** All communications with the media will be written in plain language
- **Balance:** Information provided to the media by Tasman Environmental Trust will as far as possible be objective, balanced, accurate, informative and timely.

However, contact concerning any significant matter in the name of or on behalf of Tasman Environmental Trust should only be made by staff, Board members and other volunteers where:

- They have consulted the Trust Manager
- They have the required expertise to speak on the issue under discussion

Where any of these criteria do not apply, staff, Board members and volunteers are recommended to exercise extreme caution and to seek guidance from the most senior staff or board member available.

The Trust Manager will coordinate Tasman Environmental Trust's relationships with the media.

The Trust Manager and the Board Chair are authorised to speak on behalf of Tasman Environmental Trust.

Other staff, board members and volunteers are advised to ensure they are properly briefed and guided by the Trust Manager or Board Chair **before** talking to the media on any issue related to Tasman Environmental Trust or its Projects.

Where information or public comment is requested or required, the Trust Manager shall determine the most appropriate person to respond.

It should always be made absolutely clear whether the views put forward regarding any issue relating to Tasman Environmental Trust are those of the organisation or of an individual. At all times consideration should be given as to how the correspondence may affect the reputation of The Trust.

- The Trust manager is responsible for: Authorising all media releases from Tasman Environmental Trust, and for ensuring they are on the organisation's website
- Being involved in any approaches to the media to feature Tasman Environmental Trust's work.
- Receiving and coordinating a response to all approaches from all national press, radio or TV stations or specialist press.

All staff, Board members and volunteers are responsible for:

- Providing advice (preferably before the issue becomes public knowledge) to the Trust Manager on any issues that are likely to be complex or contentious or to be sustained for any length of time. In such a situation the Trust Manager will work with the relevant staff and board members to produce a communications plan which will ensure that balanced, timely information is provided to keep all parties informed.
- Ensuring that no photos of ??? shall be released to the public via advertising, news media, or internet, or by any other means, without the approval of the Trust Manager, who shall satisfy themselves that the organisation's Privacy Policy has been observed, including ensuring that permission from Staff, Volunteers or Land owners has been obtained.
- Notifying the Trust Manager of any contact made in the name of Tasman Environmental Trust to the media and providing the name of the reporter or writer and the media outlet they represent.

Any significant media contacts with Tasman Environmental Trust's staff or members on any issue likely to prove contentious shall, where possible, be videotaped.

Any filming or taping on Tasman Environmental Trust's property or of the organisation's proceedings by the media is subject to prior permission of the Trust Manager or Board Chair.

Every effort should be made to assist the media in their inquiries. Requests for detailed information, whether from the local or national media, should be referred to the Trust Manager.

Social Media

Social media represent a dominant form of communication for not-for-profit organisations, allowing them to engage their members and the wider public more easily than ever before.

However, it is also an area in which rules and boundaries are constantly being tested. This policy acts in conjunction with the Media Relations Policy in order to maximise our social media reach while protecting our public reputation.

Tasman Environmental Trust seeks to encourage information and link-sharing amongst its membership, staff and volunteers, and seeks to use the expertise of its employees and volunteers in generating appropriate social media content.

At the same time, social media posts should be in keeping with the values that Tasman Environmental Trust wishes to present to the public, and posts made through its social media channels should not damage the organisation's reputation in any way.

Due to the fast-moving nature of social media and the constant development of new social media programs, it is important that this policy and its procedures be reviewed at regular intervals.

Tasman Environmental Trust's social media use shall be consistent with the following core values:

- **Integrity:** Tasman Environmental Trust will not knowingly post incorrect, defamatory or misleading information about its own work, the work of other organisations, or individuals. In addition, it will post in accordance with the organisation's Copyright and Privacy policies.
- **Professionalism:** Tasman Environmental Trust's social media represents the organisation as a whole and should seek to maintain a professional and uniform tone. At all times the impression should remain one of a singular organisation rather than a group of individuals.
- **Information Sharing:** Tasman Environmental Trust encourages the sharing and reposting of online information that is relevant, appropriate to its aims, and of interest to its members.

Tasman Environmental Trust should seek to grow its social media base and use this to engage with existing and potential members, donors and stakeholders. At the same time, a professional balance must be struck which avoids placing the organisation's reputation at risk.

Staff and volunteers may, when authorised, post on behalf of Tasman Environmental Trust using the organisation's online social media profiles. This is to be done only with the express knowledge and authorisation of the Trust Manager.

The Trust Manager has ultimate responsibility for:

- Ensuring that all posts are in keeping with Tasman Environmental Trust's core Social Media Policy.
- Ensuring appropriate and timely action is taken to correct or remove inappropriate posts (including defamatory and/or illegal content) and in minimising the risk of a repeat incident.
- Ensuring that appropriate and timely action is taken in repairing relations with any persons or organisations offended by an inappropriate post.
- Moderating and monitoring public response to social media, such as blog comments and Facebook replies, to ensure that trolling and spamming does not occur, to remove offensive or inappropriate replies, or caution offensive posters, and to reply to any further requests for information generated by the post topic.

It is important to maintain the balance between encouraging discussion and information sharing and maintaining a professional and appropriate online presence.

Delegation

Social media is often a 24/7 occupation; as such, such responsibilities as outlined above may be delegated by the Trust Manager to another appropriate staff member/volunteer.

Posting to social media

Social media posts should:

- Be of interest to Tasman Environmental Trust's members and stakeholders
- Be in keeping with the interests of the organisation and its constituted aims
- Should not be construed as an attack on another individual, organisation or project
- Be acceptable to Tasman Environmental Trust's donors and stakeholders
- Ensure that if there is a link attached to the post, the link works, and the information it links to is from an appropriate source
- Ensure If reposting information, the original poster is an individual or organisation that Tasman Environmental Trust is happy to associate itself with
- Ensure the tone and the content of the post is in keeping with other posts made by Tasman Environmental Trust.

Any uncertainty about whether the post is suitable, should be discussed with the Trust manager prior to posting.

Damage limitation

In the event of a damaging or misleading post being made, the Trust Manager should be notified as soon as possible, and the following actions should occur:

- The offending post should be removed.
- Where necessary an apology should be issued, to the individual or organisation involved and publicly where appropriate.
- The origin of the offending post should be explored, and steps taken to prevent a similar incident occurring in the future.

If the mistake seems set to grow, or to cause significant damage to the organisation's reputation, revert to the Media Relations Policy and seek external advice where appropriate.

Moderating social media

The reputation of Tasman Environmental Trust is first and foremost, and this involves maintaining a safe and friendly environment for its members.

From time to time social media forums may be hijacked by trolls or spammers or attract people who attack other posters or the organisation aggressively. In order to maintain a pleasant environment for everybody, these posts need to be moderated.

Freedom of speech is to be encouraged, but if posts contain one or more of the following, it is time to act:

- Excessive or inappropriate use of language including swearing
- Defamatory, slanderous or aggressive attacks on Tasman Environmental Trust, other individuals, organisations, projects or public figures
- Breach of copyrighted material not within reasonable use, in the public domain, or available under Creative Commons license
- Breach of data protection or privacy laws
- Topics which fall outside the realms of interest to members and stakeholders, and which do not appear to be within the context of a legitimate discussion or enquiry.

If a post appears only once:

- Remove the post as soon as possible
- If possible/appropriate, contact the poster privately to explain why you have removed the post and highlighting Tasman Environmental Trust's posting guidelines.

If a poster continues to post inappropriate content, or if the post can be considered spam:

- Remove the post as soon as possible
- Ban or block the poster to prevent them from posting again.

Banning and blocking should be used as a last resort only, and only when it is clear that the poster intends to continue to contribute inappropriate content. However, if that is the case, action must be taken swiftly to maintain the welfare of other social media users.

The decision to block, ban and remove posts ultimately lies with the Trust Manager, but may, at their discretion, be delegated to responsible staff and volunteers.

Email Retention and Archiving

Material that should be preserved should be clearly distinguished from material that should be purged from the system.

Electronic document retention management needs to meet multiple objectives:

1. that legal document retention requirements are met
2. that important emails remain accessible for operational purposes
3. that *Privacy Act* obligations to delete certain personal information is complied with
4. that email retention does not materially degrade IT system performance;

To help employees determine what information sent or received by email should be retained and for how long, this policy identifies the broad categories of electronic messages processed by the Tasman Environmental Trust system and sets out the factors to be considered in setting practice guidelines to be adopted in each case.

It is the responsibility of the Trust Manager to ensure that:

- staff and volunteers are aware of this policy;
- any breaches of this policy coming to the attention of management are dealt with appropriately.

It is the responsibility of all staff and volunteers to ensure that their usage of email conforms to this policy.

The first step is to consider whether there is a particular legal obligation to retain the email for a minimum period of time. The email can then be classified for Tasman Environmental Trust's internal purposes as one of:

1. Material of permanent significance (perpetual)
2. Administrative correspondence (4 years)
3. Fiscal correspondence (4 years)
4. General correspondence (1 year)
5. Ephemeral correspondence (retain until read and acted upon, then destroy)

The email should then be retained for the longer of the minimum legal period and the period set down in Tasman Environmental Trust's internal classification.

Classification of Correspondence

1. Material of permanent significance

Material that requires permanent retention include:

- any material required to be retained in accordance with legal obligations (see further explanation below under the heading, 'Legal Requirements');
- items of historical significance to the organisation;
- emails creating or recording permanent legal relationships; and
- items recording significant policies or precedents.

To ensure material of permanent significance is retained in an accessible format, emails should be saved to the appropriate shared file in Dropbox. Retention of such material will be administered by the Trust Manager.

2. Administrative Correspondence

Tasman Environmental Trust's Administrative Correspondence includes, though is not limited to, confidential management information, employee-related information, and project-related correspondence.

To ensure material of significance is retained in an accessible format, emails should be saved to the appropriate shared file in Dropbox. Retention of such material will be administered by the Trust Manager.

3. Fiscal Correspondence

Tasman Environmental Trust's Fiscal Correspondence includes all information related to revenue and expense for the organisation. To ensure material of significance is retained in an accessible format, emails should be saved to the appropriate shared file in Dropbox. Retention of such material will be administered by the Trust Manager.

4. General Correspondence

Tasman Environmental Trust's General Correspondence covers information that relates to customer interaction and the operational decisions of the organisation. The individual employee is responsible for email retention of General Correspondence where this is likely to be of continuing usefulness.

5. Ephemeral Correspondence

Tasman Environmental Trust's Ephemeral Correspondence is by far the largest category and includes personal emails, emails dealing with the work of the day, and emails containing information outdated by events. Staff may destroy this after reading and acting on the material.

Privacy

The Board of Tasman Environmental Trust is committed to protecting the privacy of personal information which the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

Tasman Environmental Trust collects and administers a range of personal information for the purposes of communications and monitoring and reporting. The organisation is committed to protecting the privacy of personal information it collects, holds and administers (refer to Tasman Environmental Trust's privacy statement – Appendix A)

Tasman Environmental Trust recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy statement (appendix A).

Tasman Environmental Trust is bound by laws (refer appendix B) which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

Tasman Environmental Trust will

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Collection

Tasman Environmental Trust will:

- Only collect information that is necessary for the performance and primary function of Tasman Environmental Trust.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender ??and others?).

Is gender sufficient to account for all the possibilities these days?

Use and Disclosure

Tasman Environmental Trust will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, Tasman Environmental Trust will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.

Storage by Tasman Environmental Trust

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- Before Tasman Environmental Trust discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. Tasman Environmental Trust will have systems which provide sufficient security.

Destruction and de-identification Tasman Environmental Trust

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.

Data Quality

Tasman Environmental Trust will:

- Take reasonable steps to ensure the information the Trust collects is accurate, complete, up to date, and relevant to the functions we perform.

Access and Correction

Tasman Environmental Trust will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

AUTHORISATION

Signature of Board Chair

Date of approval by the Board: December 2021

Tasman Environmental Trust

Appendix A

Privacy Statement

We collect personal information from you, including information about your:

- name
- contact information
- location
- interactions with us
- areas of interest

We collect personal information about you from:

- You, when you provide that personal information to us, including via the website and any related service, through any registration process OR through any contact with us (e.g. telephone call or email).
- Third parties where you have authorised this or the information is publicly available.

If possible, we will collect personal information from you directly.

We collect your personal information in order to:

- to verify your identity
- to capture your contribution to our conservation efforts
- to provide you with information regarding conservation in our region and events and opportunities including contacting you electronically (e.g. by text or email for this purpose)
- to improve the services that we provide to you
- to undertake pre-employment checks of you
- to respond to communications from you, including a complaint
- to conduct research and statistical analysis (on an anonymised basis)
- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorised by you or the Act.

Providing some information is optional. If you choose not to enter certain information, we may not be able to communicate effectively with you or count the contribution you have made to local conservation projects.

We may disclose your personal information to:

- another entity within our group (e.g.,)
- any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products
- other third parties (for anonymised statistical information)
- a person who can require us to supply your personal information (e.g. a regulatory authority)
- any other person authorised by the Act or another law (e.g. a law enforcement agency)
- any other person authorised by you.
- A business that supports our services and products may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand, for example, cloud storage

Protecting your personal information

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

If you'd like to ask for a copy of your information, or to have it corrected, please contact us at info@tet.org.nz.

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

[If you post your personal information on the website's [message board/ chat room], you acknowledge and agree that the information you post is publicly available.]

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

Appendix A

Principles of New Zealand Privacy Law

A quick tour of the privacy principles

The Privacy Act 2020 has 13 privacy principles that govern how you should collect, handle and use personal information.

1 You can only collect personal information if it is for a lawful purpose and the information is necessary for that purpose. You should not require identifying information if it is not necessary for your purpose.

2 You should generally collect personal information directly from the person it is about. Because that won't always be possible, you can collect it from other people in certain situations. For instance, if:

- the person concerned gives you permission
- collecting it in another way would not prejudice the person's interests
- collecting the information from the person directly would undermine the purpose of collection
- you are getting it from a publicly available source

3 When you collect personal information, you must take reasonable steps to make sure that the person knows:

- why it's being collected
- who will receive it
- whether giving it is compulsory or voluntary
- what will happen if they don't give you the information

Sometimes there may be good reasons for not letting a person know you are collecting their information – for example, if it would undermine the purpose of the collection, or if it's just not possible to tell them.

4 You may only collect personal information in ways that are lawful, fair and not unreasonably intrusive. Take particular care when collecting personal information from children and young people.

5 You must make sure that there are reasonable security safeguards in place to prevent loss, misuse or disclosure of personal information. This includes limits on employee browsing of other people's information.

6 People have a right to ask you for access to their personal information. In most cases you have to promptly give them their information. Sometimes you may have good reasons to refuse access. For example, if releasing the information could:

- endanger someone's safety
- create a significant likelihood of serious harassment
- prevent the detection or investigation of a crime
- breach someone else's privacy

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A person has a right to ask an organisation or business to correct their information if they think it is wrong. Even if you don't agree that it needs correcting, you must take reasonable steps to attach a statement of correction to the information to show the person's view.

8

Before using or disclosing personal information, you must take reasonable steps to check it is accurate, complete, relevant, up to date and not misleading.

9

You must not keep personal information for longer than is necessary.

10

You can generally only use personal information for the purpose you collected it. You may use it in ways that are directly related to the original purpose, or you may use it another way if the person gives you permission, or in other limited circumstances.

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You may only disclose personal information in limited circumstances. For example, if:

- disclosure is one of the purposes for which you got the information
- the person concerned authorised the disclosure
- the information will be used in an anonymous way
- disclosure is necessary to avoid endangering someone's health or safety
- disclosure is necessary to avoid a prejudice to the maintenance of the law

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You can only send personal information to someone overseas if the information will be adequately protected. For example:

- the receiving person is subject to the New Zealand Privacy Act because they do business in New Zealand
- the information is going to a place with comparable privacy safeguards to New Zealand
- the receiving person has agreed to adequately protect the information – through model contract clauses, etc.

If there aren't adequate protections in place, you can only send personal information overseas if the individual concerned gives you express permission, unless the purpose is to uphold or enforce the law or to avoid endangering someone's health or safety.

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A unique identifier is a number or code that identifies a person in your dealings with them, such as an IRD or driver's licence number. You can only assign your own unique identifier to individuals where it is necessary for operational functions. Generally, you may not assign the same identifier as used by another organisation. If you assign a unique identifier to people, you must make sure that the risk of misuse (such as identity theft) is minimised.