

## Privacy Policy

### 1.0 Introduction

This Privacy Policy has been published to provide a clear and concise outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by Waste Management NZ Ltd and its related companies ("WM"). The Policy relates to personal information collected by any means and by any technology.

WM treats the handling of your personal information very seriously. To that end, WM has systems and procedures in place to protect your privacy in relation to the handling of your personal information.

WM abides by the obligations set out in the [Privacy Act 2020](#), which relate to the collection, disclosure, use, and storage of personal information. WM's objective is to handle information responsibly and provide you with some control over the way information about you is handled.

In New Zealand the Privacy Act 2020 provides for exemptions which are outlined in this Policy.

### 2.0 Collection of Personal Information

- a) Personal information is information or opinion from which an individual's identity may be ascertained. The nature of personal information collected by WM generally comprises an individual's name and contact details (including address, phone, fax and e-mail). Such personal information is collected for the purposes of arranging, conducting, and promoting the WM's various business activities.
- b) WM also collects other types of personal information from time to time (e.g., credit information and drivers licence details), and will inform you upon collecting such information the purpose for which it is being collected.
- c) As you know WM requires you and all other employees to undergo a medical examination and drug and alcohol screening prior to and during the course of your employment with WM.
- d) WM does not collect personal information unless it is necessary for WM to perform one or more of its functions and activities. On occasion, some of this personal information may be sensitive and WM will only collect it with your consent or when required to by law.
- e) WM will destroy personal information when it is no longer required for such functions and activities.
- f) WM will generally collect personal information from you directly. For example, WM may collect personal information via telephone or letter, or when you provide a resume or enter an agreement.
- g) There may be other occasions when WM needs to source personal information from an external third party. For example, WM may collect personal information from credit agencies when establishing a credit account.

### 3.0 Use and disclosure of Personal Information

- a) Personal information provided to WM may be shared with related companies associated with WM, where it will be kept strictly confidential and will only be disclosed on a need to know basis.
- b) WM will only use and disclose your personal information for the purpose for which the personal information was initially collected.
- c) WM may also use that personal information for a purpose related to the initial purpose of collection if that other purpose would be within your reasonable expectations. Related purposes might include internal auditing and administration, adding your name to a contact list or helping us to identify business activities which may be of benefit or interest to you.
- d) WM will not use or disclose your personal information for any other purposes without first obtaining your express or implied consent. WM may however be required to disclose your personal information without your consent if the disclosure is:
  - i. Required or authorised by law;

- ii. Required in order to investigate an unlawful activity;
  - iii. Required by an enforcement body for investigative activities; or
  - iv. Necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.
- e) Generally, WM will retain your personal information within New Zealand and not use or disclose it overseas. However, on some occasions the information may need to be transferred overseas in order to perform one of WM's functions or activities. In these circumstances, WM will either obtain your express or implied consent or will use its best endeavours to ensure that your personal information will receive protection similar to that which it would have if the information were in New Zealand.
- f) As with most business organisations, WM relies on third party suppliers who are contracted to conduct specialised activities such as insurance broking, vehicle and petrol supply, telecommunication providers, supply of equipment, engineering services, security services and travel and hospitality services.

While personal information may be provided to these suppliers in order to enable them to perform the agreed tasks, WM will make every effort to ensure that the supplier handles the personal information in accordance with the [Privacy Principles](#). WM may require such suppliers to provide privacy undertakings and enter confidentiality agreements.

#### **4.0 Personal Information Quality**

WM's objective is to ensure that all personal information collected by WM is accurate, complete, and up-to-date. To assist WM in achieving its objective, please contact the Privacy Officer (details below) if any of your details change. Further, if you believe that the information WM holds is not accurate, complete, or up-to-date, please contact the Privacy Officer in order to have the information corrected.

#### **5.0 Personal Information Security**

- a) WM is committed to keeping your personal information secure, and we will take all reasonable precautions to protect your personal information from unauthorised access, loss, misuse, or alteration.
- b) Your personal information may be stored in hard copy documents, or electronically on our software or systems.
- c) WM maintains physical security over its paper and electronic data stores, such as locks and security systems. WM also maintains computer and network security using passwords to control and restrict access to authorised staff for approved purposes. Where information is particularly sensitive, the information is overwritten and then manually deleted.

#### **6.0 Access to Personal Information**

- a) You may request access to the personal information WM holds about you.
- b) The procedure for gaining access is as follows:
  - i. All requests for access to your personal information must be made in writing and addressed to the Privacy Officer;
  - ii. You must provide as much detail as possible regarding the business entity, department or person to whom you believe your personal information has been provided, and when. This will allow us to process your request faster;
  - iii. WM will acknowledge your request within 14 days, and access will usually be granted within 14 days, or if it is more complicated, 30 days. WM will inform you if this timeframe is not achievable;

- iv. You will be asked to verify your identity;
  - v. A fee may apply to such access in the event that a request for access is onerous or time consuming. Such a fee will cover staff costs involved in locating and collating information, and reproduction costs;
  - vi. Depending on the circumstances, you may be forwarded the information by mail or email, or you may be required to personally inspect your records at the appropriate place; and
  - vii. You will be given the opportunity to correct any personal information which is no longer accurate.
- c) In some circumstances, we may not be in a position to provide access. Such circumstances include where:
- i. Access would create a serious threat to safety;
  - ii. Providing access will have an unreasonable impact upon the privacy of other individuals;
  - iii. Denying access is required or authorised by law;
  - iv. The request is frivolous;
  - v. Legal proceedings are underway or are imminent;
  - vi. Negotiations may be prejudiced by such access; or
  - vii. Access would reveal a commercially sensitive decision making process.
- d) If WM denies access to your personal information, we will provide you with reasons in writing.

## 7.0 Changes to this Policy

WM may change this Policy from time to time for any reason and will update the Policy accordingly.

## 8.0 Complaints

If you believe that your privacy has been infringed, you are entitled to complain. All complaints should initially be in writing and directed to the [Privacy Officer](#). WM will respond to your complaint as soon as possible, within 14 working days, to let you know who is responsible for managing your query.

We will try to resolve the complaint within 30 working days. When this is not possible, we will contact you to provide an estimate of how long it will take to handle the complaint.

If you believe WM has not adequately dealt with your complaint, you may complain to the **Privacy Commissioner** whose contact details are as follows:

PO Box 466, Auckland 1140

Ph: (09) 302 8655 or 0800 803 909 [www.privacy.org.nz](http://www.privacy.org.nz)

## 9.0 Privacy Officer's Contact Details

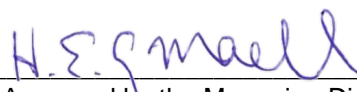
Please address all written correspondence to:

"Private and Confidential"

[Privacy Officer](#)

Waste Management NZ Limited,  
Private Bag 14919, Panmure, Auckland 1741

This Policy will be reviewed annually.

  
Approved by the Managing Director

Date 21/01/22