

# PRIVACY POLICY

**Updated March 2025** 

### 1) Background and Introduction

Community Leisure Management (CLM) is committed to protecting the privacy of our customers, employees, and partners. This Privacy Policy outlines how we collect, use, disclose, and protect personal information in accordance with the Privacy Act 2020.

#### 2) Collection and Personal Information

We collect personal information that is necessary for our business operations and for the purposes of promoting and delivering services. This may include, but is not limited to:

- Contact Details (address, email, phone number)
- Financial information (bank account details, payment history)
- Health and Safety information (incident reports, medical information/history)

# 3) Use of Personal Information

We use personal information for the following purposes:

- To provide and manage our services
- To communicate with customers, employees, and partners
- To verify your identity
- To process payments and manage accounts
- To comply with legal and regulatory requirements
- To improve our services and customer experience
- To market products and services to you, including contacting you electronically e.g. by text or email
- For any other purpose authorised by you or the Privacy Act 2020.

# 4) Storage and Disclosure of Personal Information

CLM will take all reasonable protections against the loss, misuse or inappropriate disclosure of your personal information. We will maintain processes to prevent unauthorised use or access to that information. We may disclose personal information to third parties in the following circumstances:

- To service providers who assist us in our business operations including hosting of our websites, customer relationship management systems, IT contractors etc.
- To regulatory authorities as required by law
- To other parties with the individual's consent
- Local Councils who may own the data due to contractual arrangements

#### 5) Protection of Personal Information

We take reasonable steps to protect personal information from unauthorised access, use, or disclosure. This includes:

- Implementing security measures such as encryption and access controls
- Regularly reviewing and updating our security practices
- Training our employees on privacy and data protection

#### 6) Children & Young People

CLM is committed to keeping children and young people safe. We comply with the Vulnerable Children's Act 2014 at all times. We may share information with appropriate agencies if sharing that information will protect or improve the safety, health or wellbeing of a child. By law, CLM can always share information with Oranga Tamariki or the Police.

## 7) Access and Correction of Personal Information

Individuals have the right to access and correct their personal information held by us. Requests for access or correction should be made in writing to our Privacy Officer.

#### 8) Retention of Personal Information

We retain personal information for as long as necessary to fulfil the purposes for which it was collected and to comply with legal and regulatory requirements.

## 9) Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be posted on our website and will take effect immediately upon posting.

#### 10) Contact Us

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact our Privacy Officer at: KIW@clmnz.co.nz

CLM Privacy Policy – March 2025