

# **PRIVACY POLICY**

*Updated May 2026*



## **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, store, and protect personal information in accordance with the Privacy Act 2020 (NZ) as amended by the Privacy Amendment Act 2025.

**Effective date:** This policy applies from the date shown at the top of this document and will be updated from time to time to reflect changes in our practices and in New Zealand privacy law. IPP 3A applies to collection of information from 1<sup>st</sup> May 2026.

## **2) Collection and Personal Information**

### **Direct and indirect collection (IPP 3 and new IPP 3A)**

We collect personal information either (a) directly from you (for example when you sign up for a membership, make a booking, complete a form, or contact us), or (b) indirectly from someone else or another source (for example, from a parent/guardian, your employer, a medical professional where relevant to an incident, a referee, a council, or from publicly available sources). Where we collect your personal information indirectly, we will take reasonable steps to notify you of that collection and the matters required by law, unless an exception applies. That notification will include:

- The fact that we have collected the information and the source (if appropriate)
- The purpose of collection and how we will use it
- The people or organisations we may disclose it to
- Whether providing the information is required, and any consequences of not providing it (if relevant)
- Your rights to access and correct your personal information and how to contact our Privacy Officer.

In limited circumstances, the law allows us not to notify you about indirect collection (for example, where notification would prejudice the purposes of collection, would not be reasonably practicable, would threaten life or health, would create a serious threat to public safety, or where another legal exception applies). If you have questions about whether and how IPP 3A applies in your situation, please contact our Privacy Officer.

Where we need to notify you about indirect collection, we may do this in a range of ways depending on what is most appropriate and practicable in the circumstances, for example:

- Direct notice to you (for example by email, SMS/text, phone call, or letter)
- A privacy notice or message shown within the relevant system or channel (for example in our online forms, membership/booking systems, or customer portal)
- Information provided at our facilities (for example signage, posters, reception notices, or printed forms)

- Where appropriate, through a Council or programme partner involved in your service delivery, together with a link to this Privacy Policy.

We are not required to notify you if you have previously been made aware of the collection and use of this personal information, such as listed in clause 2 and 3 of this policy.

Examples of indirect collection sources we commonly use include:

- Local Councils (where we operate facilities or deliver services under contract, including where Councils may own or control certain data under the contract)
- PerfectGym (our membership/CRM system)
- Payrix (debit/payment services provider)
- Wufoo (online forms) and SurveyMonkey (surveys)
- Fitness Passport (where you access services through that programme)
- Microsoft Outlook (email and calendar communications with you or about you)
- ChillOut CRM (where used to manage programmes/participant information)
- ecoPortal (health and safety reporting, including accident/incident and hazard/risk information)
- NZ Police Vetting Service (vetting staff)
- UKG and Frontier Payroll (staff recruitment, employment, and payroll 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 recruit, train and employ our staff
- 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 and the Privacy Amendment Act 2025.

### **4) Storage and Disclosure of Personal Information**

CLM will take reasonable steps to protect personal information against loss, misuse, and unauthorised access, use, modification, or disclosure. We maintain safeguards (including technical and organisational controls) appropriate to the sensitivity of the information. We

may disclose personal information to third parties in the following circumstances, and where practicable we require those third parties to protect the information and use it only for the services they provide to us:

- To service providers who assist us in our business operations (for example, PerfectGym, ChillOut CRM, Wufoo, SurveyMonkey, Fitness Passport, Payrix, ecoPortal, UKG, Frontier Payroll, Microsoft 365/Outlook, website and system hosting, cloud storage, and IT contractors). Some service providers may store or process information outside New Zealand. Where this occurs, we will take steps that are reasonable in the circumstances to ensure the information is protected in a way that is comparable to New Zealand privacy standards.
- To regulatory authorities as required by law
- To other parties with the individual's consent
- To Local Councils and council-controlled organisations where we deliver services under contract (for example, for contract management, reporting, auditing, and service delivery purposes). In some cases, Councils may determine how certain information is handled under the relevant contract.

If you would like more information about our use of overseas service providers (including the countries where information may be stored), please contact our Privacy Officer. While using service providers (including cloud-based systems), personal information may be stored and/or processed in New Zealand or offshore. Where personal information is stored or processed offshore, we will take reasonable steps in the circumstances to ensure it is protected in a way that is comparable to New Zealand privacy standards.

## **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 always comply with the Vulnerable Children's Act 2014. 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 request access to, and correction of, their personal information held by us. Requests should be made in writing to our Privacy Officer. We will respond within the timeframes required by the Privacy Act 2020 (not later than 20 working days after receiving the request). If we refuse a request, we will provide reasons (where permitted) and information about how you can complain. If you are not satisfied with our response, you can



raise a concern with our Privacy Officer and/or make a complaint to the Office of the Privacy Commissioner ([privacy.org.nz](http://privacy.org.nz)).

### **8) Retention of Personal Information**

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, regulatory, and contractual requirements. When information is no longer required, we will take reasonable steps to securely destroy it or de-identify it.

### **9) Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. Any changes will be posted on our website. If we make a material change, we will take reasonable steps to bring it to your attention (for example, by notice at our facilities, on our website, or by direct communication where appropriate).

### **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](mailto:KIW@clmnz.co.nz). To help us respond, please include your full name, contact details, and enough information for us to identify the issue or the information you are requesting.