Hydraulink Fluid Connectors Ltd
Employee Privacy Policy

1. Scope 1

2. Aims 2

3. Policy of Compliance 2

4. Purpose of Collection - IPP1 2

5. Source of Personal Information - IPP2 2

6. Collection of Personal Information - IPP3 3

7. Manner of Collection of Personal Information – IPP4 4

8. Storage and Security of Your Personal Information - IPP5 4

9. Access to your Personal Information - IPP6 5

10. Correction of Personal Information - IPP7 5

11. Accuracy and Updating your Personal Information - IPP8 5

12. Retention of Information - IPP9 5

13. How do we use and Collect your Personal Information - IPP10 6

14. Disclosure of your Personal Information - IPP11 6

15. Unique Identifiers - IPP12 7

16. Confidentiality 7

17. Monitoring 7

18. When Do We Disclose Your Personal Information? 7

19. Misuse of Personal Information 8

20. Response Plan if A Privacy Breach Occurs 9

21. More Information 9

22. Privacy Officer 9

23. Revisions to this Privacy Policy 10

24. Interpretation of this Privacy Policy 10

# Scope

This policy applies to all employees within Hydraulink Fluid Connectors Ltd, including:

* Board members.
* All staff, including Managers and Supervisors; full-time, part-time, or casual, temporary or permanent staff; job candidates; student placements, apprentices, contractors, sub-contractors and volunteers.
* During all on-site, off-site, ordinary hours, outside of hours or after-hours work, nationally or internationally whether at a Hydraulink Fluid Connectors Ltd site or customer site.

# Aims

Hydraulink Fluid Connectors Ltd are committed to maintaining the accuracy, confidentiality and security of your personal information. The Privacy Act 2020 has 12 information privacy principles (IPP). Hydraulink Fluid Connectors Ltd has established processes and procedures that align with the summarised principles below.

This Privacy Policy describes the personal information that Hydraulink Fluid Connectors Ltd collects from or about you, and how we use, store and to whom we disclose that information.

This Privacy Policy applies to the personal information of all individuals who seek to be, are, or were employed by Hydraulink Fluid Connectors Ltd (collectively, an "employee"), unless the personal information is collected, used or disclosed while using the Hydraulink website.

#  Policy of Compliance

It is Hydraulink's policy to lawfully comply with the privacy legislation being The Privacy Act 2020 and any amendments within each jurisdiction in which we operate. Sometimes the privacy legislation and an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy was developed to guide the activities of Hydraulink. In addition, specific privacy practices may be adopted to address the specific privacy requirements of particular jurisdictions.

This Privacy Policy has a limited scope and application and the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Privacy Policy applies to you, please contact your Privacy Officer for more information.

# Purpose of Collection - IPP1

Hydraulink Fluid Connectors Group will only collect personal information if it is for a lawful purpose connected with our functions, activities, and the information is necessary for these purposes.

# Source of Personal Information - IPP2

IPP2 outlines that personal information must be collected directly from the individual concerned unless the collection is believed to be an exception on reasonable grounds such as that compliance is not reasonably practical in the circumstances of the particular case.

Hydraulink Fluid Connectors Ltd will collect information from the employee wherever possible but where an employee is impaired in their ability to provide the necessary information because of intellectual or cognitive impairment, mental illness or medical condition this information will be collected from a person who has legal authority to act for the employee. Hydraulink Fluid Connectors Ltd will collect personal information through an informed consent process. Being:

* if the person concerned authorises collection from someone else;
* if it is necessary to uphold or enforce the law;
* if the information is collected from a publicly available source i.e. Facebook;
* if collecting information from the person directly would undermine the purpose of collection.

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer (see below for details).

# Collection of Personal Information - IPP3

IPP3 outlines that during collection of personal information, a business must take reasonable steps to ensure the individual is aware of the fact the information is being collected, for what purpose, who will use it, who will receive it, whether giving the information is compulsory or voluntary, and what will happen if the information is not provided. Hydraulink Fluid Connectors Ltd will only collect necessary information regarding the person specific to the intended use.

We collect and maintain different types of personal information in respect of those individuals who seek to be, are, or were employed by Hydraulink, including the personal information contained in:

* Resumes and/or application forms;
* References and interview notes;
* Photographs and video;
* Letters of offer and acceptance of employment
* Individual employment contracts;
* Mandatory policy acknowledgement sign-off sheets;
* Payroll information; including but not limited to income tax number and bank account information;
* Wage and benefit information;
* Forms relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short- and long-term disability and medical care;
* Emergency contact information.

In addition to the examples listed above, personal information also includes information such as name, home address, telephone, personal email address, date of birth, employee identification number and any other information necessary to Hydraulink's business purposes, which is voluntarily disclosed in the course of an employee's application for and employment with Hydraulink.

As a general rule, Hydraulink collects personal information directly from you. In -any circumstances where the personal information that we collect about you is held by a third party, e.g. employment referee, we will obtain your permission before we seek out this information from such sources.

From time to time, we may utilise the services of third parties in our business and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take all reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

# Manner of Collection of Personal Information – IPP4

IPP4 outlines that personal information must not be collected by unlawful means (such as threatening or coercive behaviour) or means that are unfair (such as misleading or deceptive behaviour) or intrude on the personal affairs of the individual (such as collecting more information than was necessary to achieve the intended purpose).

Hydraulink Fluid Connectors Ltd will collect information about a person in a way that is fair and legal. Hydraulink Fluid Connectors Ltd will ensure that the admission forms and processes are properly explained, and that sufficient time and privacy is given for forms to be completed.

The personal information collected is used and disclosed for our business purposes, including establishing, managing or terminating your employment relationship with Hydraulink. Such uses include:

* Determining eligibility for initial employment, including the verification of references and qualifications;
* Administering pay and benefits;
* Processing employee work-related claims (e.g. ACC or worker compensation, insurance claims, etc.)
* Establishing training and/or development requirements;
* Conducting performance reviews and determining performance requirements;
* Assessing qualifications for a particular job or task;
* Gathering evidence for disciplinary action, or termination;
* Establishing a contact point in the event of an emergency (such as next of kin);
* Complying with applicable employment legislation;
* Compiling directories;
* Ensuring the security of company-held information;
* Such other purposes as are reasonably required by Hydraulink.

# Storage and Security of Your Personal Information - IPP5

Hydraulink endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

# Access to your Personal Information - IPP6

You can ask to access the personal information that we hold about you at any time. If you want to review, verify or correct your personal information, please contact your Privacy Officer. Please note that any such communication must be in writing.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you, e.g. material of an evaluative nature, or due to risk to public safety and/or harrassment. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavour to inform you of the reasons why, subject to any legal or regulatory restrictions.

# Correction of Personal Information - IPP7

Where your consent was required for our collection, use or disclosure of your personal information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer (see below for details).

Where an agency holds personal information, the individual concerned shall be entitled:

(a) to request correction of the information; and

(b) to request that there be attached to the information a statement of the correction sought but not made.

# Accuracy and Updating your Personal Information - IPP8

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your employment, please keep us informed of such changes.

Hydraulink Fluid Connectors Ltd will endeavour that all personal information that is held shall not be used without taking such steps (if any) as are, in the circumstances, reasonable to ensure that, having regard to the purpose for which the information is proposed to be used, the information is accurate, up to date, complete, relevant, and not misleading.

# Retention of Information - IPP9

Except as otherwise permitted or required by applicable law or regulatory requirements, Hydraulink endeavours to retain your personal information only for as long as it believes is necessary to fulfil the purposes for which the personal information was collected (including, for the purpose of meeting any legal, accounting or other reporting requirements or obligations). We may, instead of destroying or erasing your personal information, make it anonymous such that it cannot be associated with or tracked back to you.

# How do we use and Collect your Personal Information - IPP10

We may use your personal information:

* For the purposes described in this Privacy Policy; or
* For any additional purposes that we advise you of and, where your consent is required by law, we have obtained your consent in respect of the use or disclosure of your personal information.

We may use your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

# Disclosure of your Personal Information - IPP11

Hydraulink Fluid Connectors Ltd shall not disclose the information to a person or body or agency unless the agency believes, on reasonable grounds:

(a) that the disclosure of the information is one of the purposes in connection with which the information was obtained or is directly related to the purposes in connection with which the information was obtained; or

(b) that the source of the information is a publicly available publication and that, in the circumstances of the case, it would not be unfair or unreasonable to disclose the information; or

(c) that the disclosure is to the individual concerned; or

(d) that the disclosure is authorised by the individual concerned; or

(e) that non-compliance is necessary—

(i) to avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution, and punishment of offences; or

(ii) for the enforcement of a law imposing a pecuniary penalty; or

(iii) for the protection of the public revenue; or

(iv) for the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation); or

(f) that the disclosure of the information is necessary to prevent or lessen a serious threat (as defined in section 2(1)) to—

(i) public health or public safety; or

(ii) the life or health of the individual concerned or another individual; or

(f)(a) that the disclosure of the information is necessary to enable an intelligence and security agency to perform any of its functions; or

(g) that the disclosure of the information is necessary to facilitate the sale or other disposition of a business as a going concern; or

(h) that the information—

(i) is to be used in a form in which the individual concerned is not identified; or

(ii) is to be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned; or

(i) that the disclosure of the information is in accordance with an authority granted under section 54.

#  Unique Identifiers - IPP12

IPP12 says that a unique identifier must not be assigned to individuals unless it is necessary to enable an agency to perform its functions efficiently. This provides a safeguard against the creation of a single identifier that could be used to cross match data across agencies.

# Confidentiality

The highest possible standards of confidentiality will be maintained in relation to all information provided by clients, staff, contractors, volunteers, students, and external organisations associated with The Hydraulink Group. This applies to all written and verbal information.

# Monitoring

The work output of Hydraulink's employees, whether in paper record, computer files, or in any other storage format belongs to Hydraulink, and that work output, and the tools used to generate that work output, are always subject to review and monitoring by Hydraulink.

In the course of conducting business, Hydraulink may monitor employee activities (including customer services calls) on our premises and property. For example, some of our locations are equipped with surveillance cameras. These cameras are generally in high risk areas. Where in use, surveillance cameras are there for the protection of employees and third parties, and to protect against theft, vandalism and damage to Hydraulink's goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime or acitivty requiring investigation, in which case they may be turned over to the police or other appropriate government agency or authority. Pursuant to our IT, Internet, Email and Social Media Policy, Hydraulink reserves the right to monitor all employees' computer and e-mail use from time to time

This section does not intend to imply that all employees will be monitored or their actions are subject to constant surveillance. However employees should be aware that monitoring may occur and may result in the collection of personal information from employees (e.g. through their use of our resources). When using Hydraulink equipment or resources employees should not have any expectation of privacy with respect to their use of such equipment or resources.

# When Do We Disclose Your Personal Information?

We may share your personal information with our employees, contractors, consultants and other parties (including other members of Hydraulink Fluid Connectors) who require such information to assist us with establishing, managing or terminating our employment relationship with you, including: parties that provide products or services to us or on our behalf and parties that collaborate with us in the provision of products or services to you. In some instances, such parties may also provide certain information technology and data processing services to us so that we may operate our business. We may share personal information with such parties both in and outside of your home jurisdiction, and as result, your personal information may be collected, used, processed, stored or disclosed in other jurisdictions.

When we share personal information with such parties we typically require that they only use or disclose such personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy.

In addition, personal information may be disclosed or transferred to another party (including to another member of Hydraulink Fluid Connectors outside of your home jurisdiction) in the event of a change in ownership of, or a grant of a security interest in, all or a part of Hydraulink through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

Further, your personal information may be disclosed:

* As permitted or required by applicable law or regulatory requirements. In such a case, we will endeavour to not disclose more personal information than is required under the circumstances;
* To comply with valid legal processes such as search warrants or court orders;
* As part of Hydraulink's regular reporting activities to other members of Hydraulink Fluid Connectors (including outside of your home jurisdiction);
* To protect the rights and property of Hydraulink;
* During emergency situations or where necessary to protect the safety of a person or group of persons;
* Where the personal information is publicly available;
* With your consent where such consent is required by law.

# Misuse of Personal Information

Breaches of the Privacy Act by the employees of Hydraulink Fluid Connectors Ltd will be treated seriously and disciplinary action taken. The following (not limiting) practices are unacceptable to The Hydraulink Group:

* intentional breaching the Privacy Act 2020, the Health Information Privacy Code 2004 reading or copying personal information to which the reader/copier has no authorised access;
* divulging personal information given with an express undertaking that it will remain confidential;
* intentionally divulging information to any person who is not an authorised recipient of that information without lawful reason;
* falsifying records or deleting records without authorisation;
* using personal information for any purpose other than the purposes identified unless the individual has given explicit, informed consent to do so.

Under the Crimes Act 1961 it is an offence if an employee corruptly uses or discloses any information acquired by him or her in their official capacity to obtain directly or indirectly an advantage or monetary gain for the employee or any other person.

# Response Plan if A Privacy Breach Occurs

A privacy breach occurs when personal information is lost, stolen, or accessed without permission. Sometimes, an organisation may be prevented from accessing information they hold. Common examples include theft of documents or electronic devices, computer hacks, ransomware attacks, employee browsing, or emails being sent to the wrong person. Privacy breaches can also happen through workplace gossip.

Hydraulink Fluid Connector Ltd's response plan, should a privacy breach occur, includes the following steps:

1. **Contain** the privacy breach to prevent any further compromise of personal information. Inform the Privacy Officer of a possible privacy breach.
2. **Assess** the privacy breach by gathering facts and evaluating risks, including potential harm to affected individuals and, where possible, taking action to remediate any risk of harm.
3. **Notify** - Determine whether privacy breach is notifiable by using Office of Privacy Commissioner (OCP) guidelines. The online tool NotifyUs is the best way to report privacy breaches to the Commissioner: www.privacy.org.nz/notify-us
4. **Prevent** - When the privacy breach has been resolved and the crisis is over, take steps to prevent future breaches.

# More Information

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact the Privacy Officer by telephone, in writing or by e-mail. We will endeavour to answer your questions and advise you of any steps taken to address the issues raised by you. If you are unsatisfied with our response, you may be entitled to make a written submission to the Privacy or Information Commissioner applicable for your jurisdiction.

# Privacy Officer

We have appointed Privacy Officers to oversee compliance with this Privacy Policy. The contact information for our Privacy Officers is as follows:

***Kathryn Thompson – HR Manager (New Zealand)***

*Phone number +64 9 525 2626*

*Mobile phone* ***(+64) 27 224 2395***  *or email* ***Kathryn@hydraulink.com***

Duties of the Privacy Officer include:

* ensuring that Hydraulink Fluid Connectors Ltd business practices comply with the Privacy Act;
* training staff to understand and comply with privacy requirements;
* ensuring discussions involving employee/family/whanau are held in a suitable environment to maximise privacy;
* any access to client files is appropriately managed;
* managing data breaches;
* dealing with requests made to Hydraulink Fluid Connectors Ltd for access to, or correction of personal information;
* working with the Privacy Commissioner during the investigation of complaints

# Revisions to this Privacy Policy

Hydraulink Fluid Connectors Ltd may from time to time make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will communicate any revised version of this Privacy Policy. Any changes to this Privacy Policy will be effective from the time they are communicated, provided that any change that relates to why we collect, use or disclose your personal information will not apply to you, where your consent is required to such collection, use or disclosure, until we have obtained your consent to such change.

# Interpretation of this Privacy Policy

Any interpretation associated with this Privacy Policy will be made by the Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation’.

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Hydraulink any rights or obligations outside of, or in addition to, any rights or obligations imposed by the privacy laws applicable to such individual's personal information. Should there be, in a specific case, any inconsistency between this Privacy Policy and such privacy laws, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.