

Holistic Safeguarding Privacy and Website Policy



Safeguarding You
to Safeguard Children

Our Commitment

Ethical and safe practice is at the core of all we advocate for and do. In addition to child and adult safeguarding, this extends to keeping your personal information secure. We value anyone we have the pleasure of coming into contact with, and we are committed to protecting your privacy, so we make sure we protect any of your personal data that we have.

The purpose of this policy, together with other relevant policies or procedures (detailed at the end of this policy) is to help clarify how Holistic Safeguarding gathers, uses and takes every measure possible to protect the individual and organisational information we hold. We are committed to ensuring:

- All our practice is ethical and in accordance with New Zealand legal requirements.
- Privacy is protected, we will make sure all information gathered, held and used is done so in accordance with this policy.
- We always remain respectful of the trust placed in us and compliant with the obligations upon us, relating to information data (including potentially identifying, personal and/or sensitive data).
- There is an openness on how some of our ICT (Information Communication Technology) and other IT (Information Technology) resources may have a relevance to information gathering and sharing (in some cases beyond Holistic Safeguarding's control).
- Our Privacy Policy remains current, in accordance with legal requirements and continues to reflect every effort being taken to ensure best practice is demonstrated.

Policy Scope

This policy applies to all individual and organisational, personal information that we gather and hold through various means.

Personal Information

In accordance with the Privacy Act 1993, we recognise 'personal information' as meaning any information about an identifiable individual. Effectively information relating to the below is deemed to be personal information:

- Any information that can be used to identify you; or
- You are reasonably identifiable from it.

Examples of personal information may include:

- Basic personal information (e.g. your name, your contact information (full postal address, email and phone data)).
- Professional Data, e.g. (place of employment, sector representation, position title, etc.).
- Financial details (bank account number, product payment data, e.g. credit/debit card information).
- IP address.
- Any imagery (photos, videos, etc.) or audiology (e.g. recordings) used as part of our engagement with and/or working together with you. This may also include any such like data shared you with Holistic Safeguarding via our social media resources, etc.



A significant focus of Holistic Safeguarding is where possible, providing tailored services and resources. To help us ensure we can inform you of and/or provide you with, provisions applicable to your needs and/or interests, we may also gather diversity information. This may include:

- Age
- Gender
- Sexual Orientation
- Race
- Additional Needs
- Politics
- Ethnicity
- Religion
- Culture
- Health

Ways of Gathering Personal Information

Our service engagement provisions, operational ways of working and organisational resources hold facilities for gathering information about individuals and/or organisations. For example, we may collect and/or process any information that is provided to us:

- Via service enquiries, advice/guidance and/or service consultations.
- Via service registrations, subscriptions, use and/or commissions.
- Product enquiries, downloads, purchases and/or events (e.g. training provisions/events).
- By additional information provided to us as a necessary need for us to be able to deliver you with products and/or services in response to your Holistic Safeguarding enquiry and/or engagement.
- Via ICT (Information Communication Technology), our website, online products and/or service registrations and any underpinning ICT analytical data (e.g. IP address, location data, how you found our website, etc.).
- Via involvement with any Holistic Safeguarding customer surveys, campaigns, networking and/or community events/development initiatives.
- Via participation within any product and/or service research and/or evaluation surveys. This includes someone providing us with your information (e.g. your employer) in order for you to register for, participate within or access, any of these services and/or products.
- To us directly, via engagement with Holistic Safeguarding staff, visits, events or online resources, e.g. website, social media, etc.
- To us indirectly, our representatives, or partner agencies, or otherwise, whether via physical or online channels.

Keeping Your Information Up To Date

In addition to ongoing internal data management processes when we are made aware of any information changes, we may from time to time, undertake other methods to help us make sure the records we hold for you are up-to-date and reflect any changes within your personal information.

To achieve this we may contact you directly, or third parties that we consider as legitimate and trustworthy and in circumstances where it is appropriate and where you will have had a clear expectation that your details would be passed on for this purpose.

We may also combine the information you provide us with information we collect from trusted third parties and partners such as business partners, sub-contractors, advertising networks, analytics providers, search information providers, credit reference agencies as well as publicly available sources.

Reasons for Collecting Personal Information

How we use personal information

Information data is used to help us provide you, organisations, sectors and/or communities, with information, services or products that align to your/their interests, needs or that have been identified as potentially being of relevance.

Data collection helps us perform our business activities and functions to the best level possible and ensure that our customer service remains qualitative. The following are some of the ways we use your personal information for our core activities:

- To provide products and services to you.
- To communicate with you including by email, mail or telephone.
- To personalise and customise your experience and as much as possible tailor our services and provisions to your needs.
- To provide you with news, information or advice about our existing, new and upcoming products and/or services.
- To manage and enhance our products and services
- To conduct business processing functions for the operation of our website or our business.
- For our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers.
- To provide your updated personal information to us, our contractors or external service providers.
- To investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity.
- As required or permitted by any law (including the Privacy Act).

Ethical Practice

We also support ethical practice by working to:

Consent: Where applicable seeking your permission to use your personal data in a specific way, and you've agreed. E.g. Imagery data, to send you marketing information, etc.

Contract: We may process your personal data as part of an agreement you have with us. E.g. if you purchase or download something from our online shop, or purchase any of our Consultancy and/or Learning and Development services.

Legal Obligation: We may collect or share your personal data where we are required to do so by law. E.g. to fulfil a regulatory requirement or expected practice, or for fraud detection.

Vital Interests: Where there's an immediate risk to your health and safety, or there's a risk to the health and safety of others, we may use your personal data.

Legitimate Interests: Our legitimate interest is in engaging with individuals, organisations and communities to help raise awareness of the risks of child abuse, unsafe practice when working with/engaging with children/young people and advocate collective participation towards child safety.



Whenever we use this justification, we will always conduct a balancing exercise to ensure that we consider the impact on you as an individual to ensure that our interests are not overridden by the impact on you. Some examples of activities where we rely on legitimate interests are:

- Sending you direct marketing via post;
- Conducting research to identify service needs and/or measure, or improve the services we offer;
- Sharing personal information amongst relevant customer groups and communities to ensure we communicate with individuals, organisations and sectors in the most effective way;
- Purchasing marketing lists to promote our professional services via email to those who work directly or indirectly with children and young people;
- Handling any compliments or complaints.

Some of these activities may also involve 'automated decision-making'. However, you have the right to object to the use of your personal information for profiling and automated decision-making processes. For information on how to exercise these rights, please see the section on 'Your Rights' below.

If you do not want us to use your data for direct marketing purposes, you can contact us at info@holisticsafeguarding.com.

What it means if we can't collect personal information

When we do not hold the personal information as noted within this policy, some or all of the following may happen:

- We may not be able to provide you with the products or services you requested, either to the same standard, or at all (for example, if you do not register as a member of a website, you will not be able to access features or services that are reserved for members only);
- We may not be able to provide you with information about products and services that you may want, including information about discounts sales or special promotions; or
- We may be unable to tailor the content of our resources to your preferences and your experience of those resources may not be as enjoyable or useful.

Storing of Personal Information

We take all steps reasonably necessary to make sure your data, whether in paper or electronic form, is treated securely and in accordance with this privacy policy and legislative requirements.

Main areas for the storage of information related to:

- Holistic Safeguarding's Customer Relationship Management (CRM) system.
- Our customer and partner mailing lists.
- Service and product enquiry, registration and purchase channels data being noted within Holistic Safeguarding's CRM system and within Holistic Safeguarding documents that are stored within a secure cloud system.
- Website and analytical survey data, e.g. your IP address. This information is held with those service providers.
- Where applicable within a secure registration system for those provisions aligned to these requirements. Where we have given you (or where you have chosen) a password which enables



you to access certain parts of our website, you are responsible for keeping the password confidential. You agree not to share that password with anyone else.

The personal information collected from you, where applicable may be transferred to and stored at, a destination outside of New Zealand (e.g. USA). It may also be processed by individuals operating outside of New Zealand who works for us or working on our behalf. This includes staff engaged in, among other things, the processing of your Holistic Safeguarding website services and payment functions.

By submitting your personal data, you agree to this transfer, storing and processing at a location outside of New Zealand. Where data is transferred outside New Zealand, these partner agencies have confirmed in their terms and conditions and service level agreements that they offer the same levels of data security.

Your personal information will not be retained by us for longer than necessary in relation to the purposes for which it was initially collected, or for which it was further processed.

Security of Personal Information

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

Unfortunately, the transmission of information via the internet is never 100% secure, and we cannot guarantee the security of your data transmitted to our website. This means any such transmission is at your own risk.

To protect yourself when sending us sensitive information, please ensure that you use devices running supported operating systems that are regularly patched, and incorporate some form of malware protection. Only connect your devices to networks that you trust.

Payment Card Information

If you make a payment to purchase one of our products, STRIPE will process your payment. STRIPE will encrypt and store your payment card number securely, in accordance with STRIPE Privacy Policy available at <https://stripe.com/gb/privacy>.

STRIPE protects personal information (at a minimum) to the Payment Card Industry Data Security Standards (PCI-DSS). Your payment card number is not held by and is never revealed to us. We do not store payment card data on our own systems.

Your Rights and Accessing Your Personal Information

I. Right to access your personal information

You have the right to access the personal information that we hold about you in many circumstances, by making a request (info@holisticsafeguarding.com or +64 22 394 0691).

Where we hold information that you are entitled to access, we will try to provide you (or someone else on your behalf (subject to written consent and authorisation from yourself)) with suitable means of accessing it (e.g. by mailing or emailing it to you) and aim to do so within 30 days from when your identity has been confirmed.

If you make an access request, we will ask you to verify your identity.



No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be excessive in nature.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

II. Right to correct your personal data

If any of the personal information we hold about you is inaccurate, out-of-date or incomplete, you may ask us to correct it.

If in the unusual circumstance that we do not agree that there are grounds for an amendment, then we will add a note to the personal information stating that you disagree with it.

Any of our provisions supporting a Member's portal, Members will generally be able to access and update their membership details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

III. Right to stop or limit our processing of your personal data

You can ask to be removed from any of our subscription lists at any time. You have the right to object to us processing your personal information if we are not entitled to use it any more, or to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

Sharing of Personal Information

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

We may disclose your personal information to our related bodies corporate, contractors or external service providers for the operation of our websites or our business. However, we do not share your personal information with others unless this is necessary for the purpose for which you gave us the information, the law requires us to disclose it (e.g. to investigate a criminal offence), or there may be safety reasons for disclosing it.

Disclosing your personal information:

We may disclose your personal information to:

- Another entity within our group.
- 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.

We may disclose your personal information to third-parties if we're legally obliged to; or in order to enforce or apply our terms of use for our website or other agreements; or to protect the rights,



property or safety of Holistic Safeguarding and/or others. Where applicable, this information will be shared in a way that does not identify you.

Sharing With Third Parties

The personal information you provide to us may be shared with third-party contractors to the extent necessary for them to administer and improve the website on our behalf. We will not rent or sell your personal information to other organisations for use by them in any way, including in their own direct marketing activities.

We do utilise external service providers to carrying out tracking and analysis on our behalf, e.g. website analytic services, etc. This offers data such as IP addresses and locations of those accessing our IT services. Where we use an external service provider to act on our behalf, we will disclose only the personal information necessary to deliver the service and will have a contract in place that requires the provider to comply with Holistic Safeguarding information sharing and privacy policy requirements.

Child Protection: Sometimes, we cannot keep information confidential as we need to ensure all children, young people and adults at risk are safe. This means if we do receive any information that indicates you or another person is suffering or is at significant risk of suffering harm, abuse and/or neglect, we will need to inform those specialist statutory services who can offer support (such as Oranga Tamariki and/or New Zealand Police) or possibly any other agency involved in that person's life if to do so; we believe they will be safer or harm will be prevented. Sometimes we can also be subject to sharing this information by court orders.

Where we are able to we will always attempt to inform the referrer of any intended action to share information prior to doing so unless to do so would pose a risk to the child, others or any potential investigation.

For more information about how and when Holistic Safeguarding may share information in relation to a child, please see our Safeguarding and Child Protection Policy.

Using Third Parties To Update Our Records

In carrying out activities reflected within this policy, we may from time to time use publicly available information or information gathered from specialist companies. These include directories and companies that collate and analyse information from public registers to help ensure we have accurate and up to date information. These companies may have obtained this information directly from you and in circumstances where you legitimately expect that they will pass on your information to other entities.

We will only use data collected in this manner for purposes to which you have consented or, if this is not reasonably practical, where we believe it is reasonably necessary to process your personal information for the purposes for which it has been provided. Throughout all of this, we will always ensure that the privacy and security of your personal information is protected.

Points For Consideration

Website analytics: We analyse non-identifiable web traffic data to improve our services. We use Google Analytics, a paid third-party service to analyse the web traffic data for us. We own the data that is generated, and it will not be shared with any other party for any other purpose.

The data collected is aggregated and is not personally identifiable. IP addresses are masked so that they cannot be used to identify individuals. Our web analytics will also respect any "do not track" setting you might have set in your browser.

We may collect, hold, and use statistical information about visits to help us improve the site. This information is aggregated and doesn't identify you personally. It includes:

- Your IP address.
- The search terms used.
- The non-identifiable statistics of the user, e.g. age, gender, day of the week, type of device used.
- The pages visited on our site and the links you clicked on.
- The date and time you visited the site.
- The referring site (if any) through which you clicked through to this site,
- Your operating system (e.g. Windows XP, Mac OS X).
- The type of web browser you use (e.g. Internet Explorer, Safari, Mozilla Firefox).
- Other things like your screen resolution and the language settings of your browser.

IP addresses and Cookies:

IP Addresses: We may also log IP addresses (in simple terms a number that identifies a specific computer or other internet devices) to analyse trends, administer the website, track user movements, and gather broad demographic information. It also helps us to block disruptive use or establish information like the number of visits to the website from different countries.

It also means the website will recognise your computer and greet you each time you visit, without bothering you to repeat certain actions, e.g. registering, etc. It may also include information such as your approximate location, e.g. which country you are in.

Cookies: In some cases, we may also collect personal information through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. Cookies don't collect personal information, and by continuing to use our site, you agree to our use of cookies. If you do not wish to receive cookies, you can disable them (set your browser so that your computer does not accept them) or clear them out of your web browser without affecting your ability to use the site.

By collecting and recording information about your use on our site, we can provide you with a more personalised experience online and create a more effective website reflective of needs. It also helps us keep track of products or services you have shown interest in, so we can ensure you keep up-to-date with any news about those products or services.

Cookie files and IP addresses will never identify you as an individual.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the New Zealand Privacy Principles do not apply, and we may use this information for any purpose and by any means whatsoever.



Surveys: Some of our service provisions include survey data, e.g. training evaluation data, organisational safeguarding identification of need measures, etc. Whilst these surveys may be set up to support confidentiality, they are not necessarily anonymous as IPS addresses are traceable.

If you ask a question, or submit feedback, or lodge a complaint through the site, we collect your email address and sometimes other contact details. We may use your email address to respond to you. We only use the ability to contact survey participants via data provided or via our learning management system, when a response is expected (e.g. the above scenarios.).

Marketing

Direct marketing materials: We may send you direct marketing communications and information about products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (details below) or by using the opt-out facilities provided (e.g. an unsubscribe link), or by updating your personal details with us. We will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing unless expressly authorised by you.

If for any reason you receive communications from us that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please contact us using the details provided below.

Re-marketing Activities and Social Networking Services: We do use social networking services such as Facebook to communicate with customers and the public about our work. When you communicate with us using these services, data may also be shared with our customer relationship management system.

These third-party vendors may use cookies to serve these ads based on your past visits to our website or product resources. They may also collect your personal information for its own purposes. These services have their own privacy policies which are independent of ours.

We may also pass on personal information to online advertising tools, including Facebook Custom audiences, Google Adwords Match and Google Analytics, to carry out 'remarketing activities'. This means that if you've already visited our website, we can direct you back to it through ads shown on sites across the internet by third-party vendors, including Google and Facebook.

Links to other websites

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over those other websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites, and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.



Reasonableness

By using this website, you agree that the exclusions and limitations of liability set out in this website disclaimer are reasonable. If you do not think they are reasonable, you must not use this website.

Limitations of liability

Holistic Safeguarding will not be liable to you (whether under the law of contract, the law of torts or otherwise) in relation to the contents of, or use of, or otherwise in connection with, this website:

- To the extent that the website is provided free-of-charge, for any direct loss.
- For any indirect, special or consequential loss.
- For any business losses, loss of revenue, income, profits or anticipated savings, loss of contracts or business relationships, loss of reputation or goodwill, or loss or corruption of information or data.

These limitations of liability apply even if Holistic Safeguarding has been expressly advised of the potential loss.

Complaints

If you are concerned about the way your personal data is being handled, or you believe your privacy has been breached by us, or you have any other questions and/or concerns relating to your personal information, this Privacy and Website Policy, please contact us via info@holisticsafeguarding.com or [+64 22 394 0691](tel:+64223940691), we'd be more than happy to help. You may also contact us via post:

Holistic Safeguarding
4 Willow Road
Silverdale
Hamilton 3216
Waikato
New Zealand

Please provide us with as much detail as possible to support us investigating the matter. We will fully investigate any concerns and should a failing be identified; we will rectify any breaches and/or errors taking place. We may need to contact you during the process to seek any further clarification if necessary. You will also be informed of all outcomes and applicable actions taken.

We will endeavour to resolve all investigations within no more than 30-days. We will contact you within a reasonable time upon receipt of your concern and/or complaint to discuss your points further and outline options regarding how they may be resolved. We will also aim to keep you informed throughout various stages of the investigation, including if for any reason it appears the investigation will exceed the expected maximum 30-day timeframe. All requests and/or complaints are treated confidentially.

You can also make a complaint to the [Office of the Privacy Commissioner](#) who regulates all data protection and privacy matters in New Zealand. They also make a lot of information accessible via their website.

[The Office of the Privacy Commissioner](#)
[PO Box 10094, Wellington 6143.](#)
[0800 803 909 \(Monday – Friday, 10.00 am – 3.00 pm\).](#)
<https://www.privacy.org.nz/your-rights/how-to-complain/>



Policy Review

Our aim is this policy will be reviewed annually or potentially sooner if in response to any applicable practice learnings, significant child protection learnings and/or changes in legislation.

However, we do reserve the right to make changes to this Privacy Policy outside of any identified preferred timeframes. It is therefore advocated each time you visit our provisions aligned to this Privacy Policy; you re-check the review box dates to ensure no changes have been made to any sections that are important to you. Where appropriate, any changes will be notified to you by email.

Other Applicable Policies

- Holistic Safeguarding Terms and Conditions
- Holistic Safeguarding - Safeguarding and Child Protection Policy

If you have any questions or concerns please just contact us via info@holisticsafeguarding.com or [+64 22 394 0691](tel:+64223940691), we'd be more than happy to help.

Reviewed:	April 2020
Next Review Due:	April 2021