

# Playcentre Aotearoa's Privacy Policy

Playcentre Aotearoa - 13 Marina View, Paremata, Porirua 5026

Mana



## Purpose

Playcentre Aotearoa holds Personal Information regarding our children, whānau, employees and Playcentre education ākonga (adult students). We collect Personal Information in many forms (spoken, written, digital and visual). No matter what the form of Personal Information or how it is collected, we will respect and protect Personal Information we gather while providing access to that information where required.

Where we collect "Personal Information" we will use and disclose this information in accordance with this Privacy Policy, the Privacy Act 2020 and other applicable legislation.

In this Privacy Policy, 'Personal Information' is information about an identifiable individual (a natural person) as defined in the Privacy Act 2020.

Please note if we are not provided with required Personal Information where requested, we may not be able to provide our services or some of our services.

## Our privacy undertakings:

- We will protect the privacy of our Playcentre people in accordance with this Policy, the Privacy Act 2020 and other applicable privacy law.
- We will only collect Personal Information necessary for the purposes of Playcentre Aotearoa, to provide our services (including to market our services) and to meet our legal obligations.
- When we request Personal Information, we will be clear what the information requested will be used for, and we keep this information securely.

We support these privacy undertakings by:

- Appointing and maintaining a Privacy Officer
- Information retention and destruction guidelines
- Procedures to ensure all Personal Information at Playcentre will be collected, stored, used, disclosed and disposed of in accordance with privacy related legislation and its core principles.
- Any notifiable privacy breaches will be sent to the Office of the Privacy Commission as required under the Privacy Act 2020. We will notify those affected (or the representative of those affected) as appropriate.

## How we will use Personal Information

We will only use or disclose Personal Information that you have provided to us, or which we have obtained about you or your child to provide our services:

- to provide our services to you including as set out in this Privacy Policy;
- if the collection, use and disclosure of the Personal Information has been authorised by you;
- to the extent we believe it is necessary to assist a law enforcement agency or an agency responsible for national security in the performance of their functions;
- if we believe that the use or disclosure is reasonably necessary to enforce any legal rights we may have, or is reasonably necessary to protect the rights, property and safety of us, our customers, or others; or
- if we are authorised, required or permitted by law to use or disclose the information.



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## Purposes for which Personal Information may be disclosed:

We may use or disclose Personal Information that you have provided to us, or which we have obtained about you or your child:

- to provide our services;
- to process Personal Information for our own internal purposes, including (but not limited to) any business that supports us providing our services and any person that hosts or maintains any underlying IT system or data centre that we use to provide websites, services and products including to store data;
- to third parties as required or desirable to provide our services including to individual Centres, to Parenting Place (Space for you and your baby) and to the Ministry of Education including for allocation of a national student number;
- to comply with the requirements of the Education and Training Act 2020 and other legislation relating to the maintenance of official records and for accountability for public funding;
- when required by law to other government agencies such as the New Zealand Police, Oranga Tamariki, Department of Justice, Ministry of Social Development, and the Accident Compensation Commission (ACC);
- where we are required to disclose or share information by law, such as under the Oranga Tamariki Act 1989, the Family Violence Act 2018 or the Health and Safety at Work Act 2015
- to market our services and to provide promotional information, updates and newsletters in hard copy or electronic form;
- to communicate with you or your child, suppliers, staff, contractors and others; and
- to comply with our legal obligations, and to meet our reporting obligations as required by law agencies.

By providing us with Personal Information you consent to us using and disclosing that Personal Information for the purposes contemplated in this Privacy Policy.

## Access to information and our undertakings

It is important that our people can access Personal Information, including how to access information about their child and themselves, held by Playcentre Aotearoa:

- You have the right request access and correction of yours or your child's personal information;
- We will retain required records for the regulatory required periods of time, for example enrolment and attendance records will be held for at least seven years;
- For any questions regarding access of Personal Information held by Playcentre Aotearoa please contact us at [privacy@Playcentre.org.nz](mailto:privacy@Playcentre.org.nz).

## Playcentre Education as a Private Training Establishment (PTE)

In addition to the obligations under the Privacy Act 2020, Playcentre Education has additional responsibilities to its ākonga as detailed in the Education and Training Act 2020. Information collected about ākonga for their participation in the Playcentre Education programme(s) will be used solely for the purpose of Playcentre Education and not shared with the wider Playcentre Aotearoa organisation without prior ākonga consent.

## Automated Collection – Cookies

We use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognise your browser) and other similar technology to monitor your use of our website, and to collect and store certain information about your visit.

Information collected in this manner may include (but is not limited to):



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- page information including the URL of the page you are viewing;
- your browser information, including the name of the browser you are using to view the site;
- your IP address and your location derived from your IP address;
- technical information about your device (e.g., browser type, operating system, basic device information) the web page you visited or search query you entered before reaching our website, and your activities; and
- the date and time you accessed our site.
- Where collected, the above information may be used to improve our website and/or services and to review how our website is being used.

## The 13 legislated Privacy principles that we seek to uphold:

The 13 Information Privacy Principles contained in the Privacy Act 2022 can be located at:

<https://www.privacy.org.nz/privacy-act-2020/privacy-principles/>

All workers must abide by the information privacy principles in all their dealings with Playcentre members/parents/whānau and employees, and ensure they always act in accordance with the principles when collecting, storing, and disclosing personal information.

Playcentre Aotearoa workers are required to refer any request for personal information to the managing director (the nominated privacy officer for Playcentre Aotearoa). Requests from the Privacy Commissioner or workers of the Privacy Commission must be immediately referred to the Privacy Officer or Chief Executive for action.

Policy controls	Regulatory references	Other related references
<ul style="list-style-type: none"><li>• Name: Playcentre Aotearoa's Privacy and Information Management Policy</li><li>• Version: P6/R3/11.22</li><li>• Issued: July 2021</li><li>• Owner: Principal Advisor/Privacy Officer</li><li>• Approver: Chief Executive</li><li>• Review: 2023 and thereafter every three years</li></ul>	<ul style="list-style-type: none"><li>• Education (Early Childhood Services) Regulations 2008, No 47</li><li>• Licensing Criterion GMA2, GMA 3, GMA6, GMA 10, GMA 11, GMA 12</li><li>• Privacy Act 2020</li><li>• <a href="https://www.privacy.org.nz/assets/Privacy-Act-2020-content/2020-A-quick-tour-of-the-privacy-principles-Oct-2020.pdf">https://www.privacy.org.nz/assets/Privacy-Act-2020-content/2020-A-quick-tour-of-the-privacy-principles-Oct-2020.pdf</a></li></ul>	<ul style="list-style-type: none"><li>• Communications &amp; Media Policy</li></ul>

