



Catalyst.Net Limited

# Privacy Policy

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**catalyst**   
Freedom to innovate

Level 6, Catalyst House, 150 Willis Street, Wellington 6011  
PO Box 11053, Manners Street, Wellington 6142, New Zealand  
+64 4 499 2267 // [enquiries@catalyst.net.nz](mailto:enquiries@catalyst.net.nz) // [www.catalyst.net.nz](http://www.catalyst.net.nz)

# 1 Scope

1.1. This Privacy Policy describes how Catalyst collects, uses, discloses, stores and gives access to Personal Information in accordance with the Privacy Act 2020 (the 'Act'). In particular it sets out:

- a) From whom Catalyst collects Personal Information;
- b) What Personal Information Catalyst collects;
- c) How Catalyst collects Personal Information;
- d) Why Catalyst collects Personal Information;
- e) How Catalyst uses Personal Information; and
- f) How Personal Information can be accessed and corrected.

1.2. Words with capital letters have specific meanings, which you can find in Schedule 1 at the end of this Privacy Policy.

1.3. Our website and services may contain links to third party websites or services. We don't own or control those websites or services or endorse them in any way. We encourage you to review their privacy policies accordingly.

1.4. If you are an EU or UK resident, please refer to the GDPR Statement on Catalyst's website, which explains your rights and our obligations under the GDPR regime.

1.5. Any questions about this privacy policy may be directed to:

The Privacy Officer Level 6, Catalyst House, 150-154 Willis Street, Wellington, New Zealand  
[legal@catalyst.net.nz](mailto:legal@catalyst.net.nz)

## 2 From Whom Catalyst Collects Personal Information

2.1. Catalyst collects Personal Information from individuals who we interact with in the course of performing the functions and activities of our business – whether in person, through our website, or through other interactions, including:

- a) Catalyst's clients and their employees, contractors and agents;
- b) Catalyst's employees, contractors, suppliers, agents and Job Applicants; and
- c) Members of the public who visit us.

## 3 Why Catalyst Collects Personal Information

3.1. We only collect Personal Information needed for our legitimate business purposes, including for the purposes of:

- a) Providing our contracted services, for example providing technical support to clients;
- b) Administering our business, for example: contacting clients about our provision of services to them, billing, payment, providing information on request about our services, and enforcing our agreements;
- c) Ensuring the physical and digital security of you, our clients, visitors, staff and our Premises;
- d) Improving our service offerings and derive insights and trends, for example: we may use aggregated Personal Information derived from use of our services or websites to provide us with anonymous demographic and usage information. This aggregate information does not identify individuals;
- e) Supporting our marketing efforts, for example: undertaking surveys and collecting feedback, sharing your device identifiers and other information with marketing partners to help us place or display ads and marketing relevant to you on websites across the internet, and other apps, services, or devices you may use;
- f) In respect of our partners and suppliers: contacting them about their provision of services and products to us, conducting due diligence checks on them, and monitoring the performance of the products and services being provided to us; and
- g) In respect of Job Applicants: contacting them about employment positions available at Catalyst, determining suitability for the role which may include reference checks, education verification, and criminal record checks as applicable laws allow.

## 4 What Personal Information Catalyst Collects

4.1. Catalyst collects and holds different categories of Personal Information depending on our relationship with you, the services being provided.

4.2. The types of Personal Information that Catalyst collects may include:

- a) Identifying information: your name, position/job title, signature, and particularly for Catalyst's employees and Job Applicants: your date of birth, identification documents, tax identifiers;
- b) Contact information: such as your email address, physical address, and telephone number;

- c) Image: in limited circumstances we may collect your Image, including: from the CCTV at our Premises, when we record presentations, from your profile in any online services we deliver and manage that you have access to, in our employee directory;
- d) Financial information: such as your bank account number, billing information, invoice and payment details to and from you, where applicable;
- e) Profile information: such as username and password for online services we deliver and manage that you have access to, marketing communications you have responded to, survey responses;
- f) Marketing and communications information: such as marketing and communications preferences, tracking data on whether you have interacted with our digital content (including email newsletters, surveys and ads), web analytics about your interactions with our websites;
- g) Communication information: we may collect any other information supplied by you to Catalyst in the course of your interaction with us.

## 5 How Catalyst Collects Personal Information

5.1. We only collect Personal Information by lawful and fair means. Catalyst may collect Personal Information about you in a number of ways, including:

- a) When you correspond with us, whether in person, over the phone, via email or the postal system, via SMS message or other means of communication;
- b) When you use our services, or you provide products or services to us;
- c) When Personal Information is supplied to us by a third party, for example when your Personal Information is in the Client Information that a client gives us;
- d) When you visit our website, interact with us on digital platforms including social media, or interact with our digital content we may collect your Personal Information via a Data Collection Tool – see the section below;
- e) When you visit our Premises we may collect your Image (and in some cases for security purposes, sound recordings) via CCTV cameras; and
- f) From publicly available information sources, such as your contact information from a publicly accessible website.

5.2. Where practicable, Personal Information will be collected directly from you and you will be made aware of the collection purposes and your rights under the Privacy Act 2020.

## 6 Use of Data Collection Tools

- 6.1. Web analytics: We collect data about your interactions with our websites and other digital platforms including social media. The types of data we may collect include:
- a) your device's IP Address and geographic location;
  - b) how you use our website, including search terms and pages visited, downloads, time spent on a page;
  - c) date and time pages are accessed;
  - d) device type, operating system, and browser information;
  - e) other details relating to your visit which are available through the use of cookies and other tracking tools; and
  - f) if your web browser has Do Not Track enabled, we will not track your visit.
- 6.2. Cookies and tracking technologies: A cookie is a small data file that the site sends to your browser, which may then be stored on your computer system for later retrieval by the site. We may use cookies to collect information about your movements through different websites; they do not record any other Personal Information about you. Cookies are widely used on websites to help with navigation and to personalise your experience when you visit a website.
- 6.3. Email lists, registrations, surveys and feedback: We will collect information that you give us when signing up to mailing lists and registering for our events, when submitting a survey response, or feedback on your experience with our website. Analytics are performed when you open an email and click on links in the email.
- 6.4. Social media: We use social networking services such as LinkedIn to communicate with the public. When you interact with us using these services, we may collect your personal information and use it for our marketing. The social networking service will also handle your personal information for its own purpose, and you should refer to their privacy policy for details.

## 7 How Catalyst Uses Personal Information

- 7.1. Catalyst uses Personal Information only for the purpose for which it was collected, a directly related purpose, or as authorised by law.
- 7.2. Disclosure: The circumstances in which Catalyst may disclose Personal Information include:
- a) Where you consent to the disclosure;
  - b) Where the disclosure is required to effect the above purposes ("why Catalyst collects Personal Information), which may include disclosure to third party service providers, for example: cloud-storage providers, marketing partners, invoicing

partners, data analytics or research partners, and consultants and professional advisors to us; and

c) Where the disclosure is required by law.

7.3. Third party service providers: In respect of our disclosure of your Personal Information to third party service provider, their access to your Personal Information is limited to the information needed to perform tasks on our behalf, and they are contractually obliged to use your Personal Information only in accordance with our written instructions.

7.4. Overseas disclosure: Before disclosing Personal Information to overseas recipients, Catalyst will take reasonable steps to ensure that the overseas recipient is required to comply with safeguards comparable to the Privacy Act 2020 in relation to that information.

7.5. Storage and deletion: Catalyst stores Personal Information:

- a) In our IT or physical infrastructure for as long as is reasonably necessary to effect the above purposes; and
- b) In the case of CCTV Images or sound recordings, in our IT infrastructure for no longer than three (3) months (except where necessary).

7.6. Catalyst will take reasonable steps to securely destroy or permanently de-identify Personal Information that is no longer needed for any lawful purpose.

7.7. Security: We take information security seriously and therefore take reasonable steps to protect your Personal Information from misuse, interference, loss, unauthorised access, modification, destruction, or disclosure. Personal Information may be subject to the following safeguard measures:

- a) User authentication and authorisation;
- b) Network and at-rest encryption;
- c) Patching and vulnerability management;
- d) Physical security protocols; and
- e) Data breach response protocols.

## 8 Privacy Breach Notification

8.1. If there is a Privacy Breach Catalyst will comply with any legal requirement to notify you and/or the Privacy Commissioner of the breach.

## 9 How you can access and correct your Personal Information

- 9.1. We take reasonable steps to ensure Personal Information we collect and manage is accurate, up-to-date, complete, and relevant.
- 9.2. You have the following rights under the Privacy Act 2020:
  - a) The right to request access to Personal Information held about you;
  - b) The right to request correction of Personal Information held about you; and
  - c) The right to make a complaint about privacy breaches.
- 9.3. You may access and submit corrections to your Personal Information by contacting us directly by any means set out at clause 1.5. Only you, or another person you authorise, can make the request. We will verify your identity prior to providing you access or correcting your Personal Information.
- 9.4. We will respond to access and correction requests within 20 working days, unless an extension is required in which case you will be notified.
- 9.5. There is generally no fee to make a request or be given access to your Personal Information. However, depending on the complexity of the request, a reasonable processing fee may be charged in some cases. There is no fee for correcting your Personal Information.
- 9.6. If we refuse to correct Personal Information, you will be notified of the reasons and your right to complain to the Privacy Commissioner.

## 10 Complaints

- 10.1. If you believe Catalyst has breached the Privacy Act 2020, you may make a complaint to our Privacy Officer using the contact details in clause 1.5.
- 10.2. If you are not satisfied with our response to your complaint, you have the right to complain to the Privacy Commissioner:

Office of the Privacy Commissioner PO Box 10-094, Wellington 6143

**Phone:** 0800 803 909 **Email:** [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz) **Website:** [www.privacy.org.nz](http://www.privacy.org.nz)

# Appendix 1 Interpretation

In this Privacy Policy, unless the context otherwise requires:

'Catalyst', 'we', 'us', 'our' means Catalyst.Net Limited, a duly incorporated company with the company number 952897 and having its registered office at Level 6, Catalyst House, 150-154 Willis Street, Wellington, New Zealand. For the avoidance of doubt, the term includes Catalyst's agents where applicable.

'CCTV' means closed-circuit television.

'Client Information' means the data and information that a client provides to us, or that we may collect on behalf of a client, in connection with a contract for us to provide our services to them, which may include your Personal Information.

'Data Collection Tool' means technology enabling the collection, measurement, analysis and reporting of data, and includes tags, cookies, weblogs and analytics tools, see the 'Use of Data Collection Tools' section for further information.

'Image' means the representation of your likeness, whether in physical or digital form, and includes a film or digital recording.

'IP Address' means internet protocol address.

'IT' means information technology.

'Job Applicant' means a person who has submitted an application for a job at Catalyst.

'Personal Information' means information about an identifiable, live natural person.

'Privacy Breach' means any unauthorised or accidental access to, or disclosure, alteration or loss of, Personal Information, or any action that prevents Catalyst from accessing Personal Information on either a temporary or permanent basis.

'Privacy Policy' means this privacy policy.

'Premises' means any building or place owned or leased by Catalyst or any of its Related Companies, and includes the public and semi-public areas adjoining those buildings or places.

'Related Company' has the meaning given in section 2(3) of the Companies Act 1993.

'Sensitive Information' is a sub-set of Personal Information and includes information about your health, race or ethnic origin, political opinions, memberships of trade unions or political associations, religious or philosophical beliefs, sexual preferences, or criminal history. Sensitive information is more protected under the GDPR than other forms of Personal Information. In this Privacy Policy, unless otherwise stated, all references to 'Personal Information' include 'Sensitive Information'.

'SMS' means the short message service component of a communication system.

'You', 'your' means an individual whose Personal Information is the subject of this Privacy Policy.

For the purposes of interpretation and construction of this Privacy Policy:

- a) headings, underlining and the use of bold text are for convenience only and do not affect the interpretation, of the Privacy Policy;
- b) capitalised terms are defined in the Privacy Policy;
- c) words importing the singular include the plural and vice versa; and
- d) the word 'including' shall not imply restriction.