



PRIVACY POLICY

PURPOSE

St Paul's Symonds St ("St Paul's", **we, us, our**) is committed to protecting the privacy of individuals and maintaining privacy standards regarding the personal information we collect in compliance with the New Zealand Privacy Act 2020 (**the Act**) when dealing with personal information. This relates specifically to the collection, storage and security, access and correction, accuracy, retention, use and disclosure, and unique identifiers collected regarding members of our parishes and visitors/guests.

APPLICATION

This policy applies to those that are employed by St Paul's, including temporary and fixed term employees and volunteers; all members of the Clergy/Episcopal Team; contractors and representatives of St Paul's Symonds St that hold information regarding individuals.

DEFINITIONS

Personal Information

Personal information means information about an identifiable individual. It includes your name, date of birth/age, gender and contact details as well as health and other information that would enable you to be identified.

Artificial Intelligence (AI)

Artificial intelligence is computer systems doing tasks that seem like intelligent behaviour, such as finding patterns, putting items into categories, and triggering actions based on information.

Artificial intelligence (AI) Tools

AI tools are software applications that utilise artificial intelligence algorithms to perform tasks that typically require human intelligence, such as data analysis, pattern recognition,



and decision-making. These tools are designed to automate processes, provide insights, and optimise operations across various industries.

Notifiable Breach

A privacy breach that it is reasonable to believe has caused, or is likely to cause, serious harm.

1. POLICY

- 1.1 We will provide access to information for clergy, employees, and volunteers regarding the obligations under the Act and provide with training to enable them to fulfil these.
- 1.2 St Paul's will appoint a Privacy Officer who will facilitate compliance with the Act.
- 1.3 Effective internal policies and processes will be in place to prevent personal information being collected, held, shared/exchanged, accessed, or disposed of improperly.
- 1.4 This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see www.privacy.org.nz.

2. Collection of Personal Information

- 2.1 We do not collect personal information unless it is for a lawful purpose connected with a function or activity of St Paul's or directly related to the purpose for which the information was obtained.
- 2.2 Personal information collected by us will usually fall into one of the following categories:
 - Contact information (e.g. name, age, address, email address and telephone numbers).
 - Unique identifiers – an identifier that is assigned to an individual by an agency other than St Paul's for the purposes of the operations of that agency.
 - Employment information (e.g. employment history, work performance, absences, workplace incidents, next of kin information).
 - Financial information (e.g. bank account details).
 - 'Sensitive' information (e.g. medical history, criminal history).
- 2.3 If possible, we will only collect personal information from you directly. We may collect your information from you in a variety of ways including face-to-face, over the telephone, through an online form or portal, through a paper form or by email.



- 2.4 Sharing your personal information with us is voluntary, however we may not be able to complete some operations or ministry requirements (including statutory, legislative, canonical requirements) without a certain level of personal data being collected. Any impact on an individual's ability to participate in said operations or ministry requirements will be discussed with the individual.
- 2.5 Sometimes we will collect personal information from a third party or a publicly available source if it is unreasonable or impracticable to collect the personal information directly from you (e.g. checking a candidate's work history).

We may also collect information about you from another source if:

- You have given your consent for us to collect your information from another source.
- The information will not be used in a form that identifies you.
- The Privacy Commissioner has authorised the collection of information in this manner.

3. Protecting and Storing Personal Information

- 3.1 St Paul's endeavours to maintain physical, technical, and procedural safeguards that are appropriate to the sensitivity of an individual's personal information, including any photographs and videos. These safeguards are designed to prevent personal information from loss and unauthorised access, copying, use, modification, or disclosure.

Access to photographs and digital imagery is strictly limited to authorised staff members who require such access for the performance of their professional duties.

These safeguards include:

- Secure hard copy document storage (i.e. storing hard copy documents and printed photographs in locked filing cabinets).
- Password-protected data storage devices such as laptops, tablets, and smartphones.
- Restricted Digital Access: Photographs must be stored on central, church-sanctioned cloud storage (e.g., a secure Diocese-aligned SharePoint or Google Workspace) with permissions set to "Staff Only." Images are not to be stored permanently on personal devices or unencrypted removable hard drives.
- Device Management: Where staff use mobile devices to capture imagery for ministry purposes, these images must be transferred to secure church storage and permanently deleted from the device's local gallery and "recently deleted" folder within 24 hours.



- Metadata De-identification: Technical measures to "scrub" or remove EXIF metadata (including GPS location coordinates) from digital photographs before they are utilised in any digital publication.
- Providing a discreet environment for confidential discussions and the review of sensitive personal information.
- Access control for our building, including reception protocols and measures for securing the premises when unattended.
- Security measures for our website

3.2 Although we take all reasonable steps to secure personal information from loss, misuse and unauthorised access, there is an inherent risk of loss, misuse, or unauthorised access to such information. St Paul's will not be held responsible for such actions where the security of the personal information is not within our control or we cannot reasonably prevent such an incident.

4. Use and Disclosure of Personal Information

4.1 We will use your personal information:

- to verify your identity
- to communicate news and developments, including contacting you electronically (e.g. by text or email for this purpose)
- to improve the services, support, training, and other offerings that we provide to you
- to undertake credit checks of you (if necessary)
- to bill you and to collect money that you owe us, including authorising and processing credit card transactions
- to respond to communications from you, including a complaint
- to conduct research and statistical analysis (on an anonymised basis)
- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorised by you or the Act.

4.2 Regarding those employed directly by St Paul's, we may share employees' information with other St Paul's employees, consultants and other parties who require such information to assist St Paul's with establishing, managing or terminating the St Paul's employment relationship with its employees, or for purposes associated with the Protected Disclosures Act 2000.

4.3 St Paul's must comply with Privacy Principle 11 of the Privacy Act 2020 which provides that information should not be disclosed to third parties unless:



- The disclosure is directly related to the reason the information was collected in the first place.
- The individual has authorised the disclosure.
- The information is publicly available.
- Disclosure is necessary for the maintenance of the law or for legal proceedings (e.g. for the Employment Relations Authority).
- Where possible criminal or other unlawful activity is suspected.
- Disclosure is necessary to prevent or lessen a serious threat to public health or safety, or the life or health of any individual.
- The information is to be used in a form in which the individual is not identified.
- Disclosure is authorised by the Privacy Commissioner.

5. Retention of Personal Information

5.1 St Paul's will retain personal information until we no longer have a lawful purpose for doing so.

6. Accuracy of Personal Information

6.1 We will strive to ensure that all personal information we collect, use or disclose is accurate, complete and up-to date.

6.2 If we are aware that we hold personal information that (having regard to the purpose for which it was collected) is inaccurate, out of date, incomplete, or irrelevant, we will take reasonable steps to correct that information. The St Paul's Privacy Officer should be contacted in any case of inaccuracy with an individual's information.

6.3 In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

Subject to certain grounds for refusal set out in the Act, you also have the right to request a correction your readily retrievable personal information that we hold.

Before you exercise this right, St Paul's will require evidence to confirm the identity of the individual to whom the personal information relates.

7. Access of Personal Information

7.1 All individuals may request to see their personal information. Request for access to personal information should be made in writing to the Privacy Officer.

St Paul's will provide access to view the personal information in the way preferred by the individual unless this would impair efficient administration, breach a legal duty,



or breach an interest protected by one of the withholding grounds under the Act, following which the St Paul's would then give reasons for the decision.

Individuals will be able to access to view their personal information with The Privacy Officer present. Individuals are entitled to all other personal information held by St Paul's about them, their wage and time records, holiday and leave records and information held by their managers.

- 7.2 St Paul's may withhold information pursuant to Part 4 of the Privacy Act 2020. The reasons for which information may be withheld include, but are not limited to, the following:
- Giving access to information would involve the unwarranted disclosure of personal information about another person or employee.
 - The information is protected by legal professional privilege.
 - Giving access to the information could hinder an investigation into a criminal offence.

8. Website and Internet use

- 8.1 Reasonable steps will be taken to maintain secure internet connections. If you provide us with personal information over the internet, the provision of that information is at your own risk.
- 8.2 St Paul's is not responsible for personal information you provide to third party websites, regardless of if that website was accessed through the St Paul's website.
- 8.3 St Paul's uses cookies (alphanumeric identifiers) that monitor use of the website. It is the users' responsibility to disable cookies via the browser if desired. Disabling cookies may affect the functionality of the site.
- 8.4 Other website procedures relating to our privacy obligations will be displayed on the official St Paul's website and included as an appendix to this policy document. These privacy procedures may be updated independently of the review schedule for the Privacy Policy and Statement as required by St Paul's management on a schedule that suits the communications needs of St Paul's.

9. Use of Artificial Intelligence Tools

In compliance with the Privacy Act 2020, St Paul's is committed to the responsible use of Artificial Intelligence (AI) tools, ensuring that privacy is protected when such tools are employed.



- 9.1 Prior to using AI capable tools, websites or chat functions, a Privacy Impact Assessment will be conducted to review whether the AI tool is necessary and proportionate given potential privacy impacts.
- 9.2 We will be transparent about how, when and why AI tools are used within St Paul's.
- 9.3 AI tools used by St Paul's will be regularly reviewed to ensure the accuracy of their outputs. Human oversight will be applied to reduce the risks of inaccuracies, bias, or inappropriate decision making.
- 9.4 Users of AI tools will ensure that personal information is not retained or disclosed by the AI tool.

10. Privacy Breaches

- 10.1 Privacy Breaches reported to the Privacy Officer will be:
 - a) Investigated and contained as best possible.
 - b) Assessed for harm/impact.
 - c) Notified to appropriate persons/groups, including the Office of the Privacy Commissioner if 'Notifiable'.
 - d) Prevented from reoccurring by establishing or re-establishing appropriate protocols or procedures.
 - e) Recorded and tracked on the Privacy Register.

COMPLAINTS

If an individual considers that there has been a breach of the Act they are entitled to complain to St Paul's.

All complaints are to be in writing and addressed to the attention of the Privacy Officer on: privacy@stpauls.org.nz.

The St Paul's Privacy Officer will investigate the complaint and attempt to resolve it within a reasonable timeframe.

RELATED LEGISLATION

- Privacy Act 2020
- Unsolicited Electronic Messages Act 2007
- Human Rights Act 1993

OWNERSHIP AND REVIEW

This policy has been approved by St Paul's vestry and is owned by the Privacy Officer. It is to be reviewed annually and updated as required.



Updated: March2026



Appendix - Privacy Information - Website

Requesting your personal information

Under Principle 6 of the Privacy Act (2020), all individuals may request to see their personal information held by St Paul's Symonds St. Requests for access to personal information should be made in writing to the Privacy Officer at privacy@stpauls.org.nz

Historical complaints

If your request is in relation to a historical complaint, including asking for personal information relating to a historical complaint, please contact our Privacy Officer at privacy@stpauls.org.nz

Privacy breach

If you believe a privacy breach has occurred, use the Office of the Privacy Commissioner's 'Notify Us of a Breach' on this link: <https://www.privacy.org.nz/>

1. ascertain if the breach is notifiable and
2. work out the appropriate steps to take.

Notifiable breaches must be reported to the OPC. You can also contact the OPC about how best to manage your breach, whether notifiable or not. You should also inform the St Paul's Office's Privacy Officer about any breaches.

Website Privacy Protocols

In accordance with the Privacy Act 2020 and St Paul's Privacy Policy and Privacy Statement, St Paul's also follows the following privacy protocols as they relate to personal information and the use of this website.

Our website address is: <https://www.stpauls.org.nz>. This website is owned by St Paul's Symonds St.

The personal data we collect on this site and why we collect it

We collect information you have provided us with via this site. This might be your email address, phone number, name, billing address, home address, or other such details. This information is necessary for communication and engagement with you.

Cookies

Some information is automatically collected about your interaction with our website. This includes information automatically stored by cookies and other session tools, for example,



your IP address, your contact history (if there is any), etc. This information is used to improve your experience on the site. When you look at the contents of our website or use services on the site, your activities may be logged.

We may also gather information from our trusted partners with confirmation that they have legal grounds to share that information with us. This is either information you have provided to them directly or that they have gathered about you on other legal grounds.

You can change your cookie settings, but please be aware that some functions and services may not be available to you when you do so.

Contact forms

We collect information that you give us when you use a contact form on our website. This information is emailed to us and may also be kept in our databases. You can ask us to remove this information from our records at any time. We use this information to contact you by phone and/or email and respond to you.

Embedded and linked content from other websites

Articles on this site may include embedded content (e.g. videos, images, forms) and links to other websites. Embedded content and links from other websites behave in the same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded or linked content, including tracking your interaction with the content if you have an account and are logged into that website. Where you click on a link on our website, the website you are taken to will hold any information you provide on their website.

Analytics

We use Google Analytics to gather information about who uses our website, how they interact with our site and other information that Google collects on our behalf. You can read Google's privacy policy [here](#).

How we use your personal data

We use your personal data to enhance your website experience; fulfil an obligation under law or contract; or to contact you. For example, communicating with you in relation to any contact requests, and interacting with you about information related to St Paul's. We use your personal data on legitimate grounds and/or with your consent for the following purposes:



- to send you newsletters and event registration information (from us and/or our trusted partners); and
- for other purposes for which we have previously asked your consent.

We process your personal data to fulfil obligations arising from law, and/or use your personal data for options provided by law. We reserve the right to anonymise personal data gathered and to use any such data. We will use data outside the scope of these protocols only when it is anonymised.

Who we share your data with

We value your privacy. Therefore we keep your information in confidence, except where we need to supply our third-party partners with information to fulfil any request you send and to complete necessary processes related to your interaction with us via this website.

How long we retain your data

We retain your anonymised data indefinitely. We save information gathered about you for as long as needed for appropriate purposes or other obligations deriving from law, but no longer than is necessary. You can request that we correct and/or delete any personal data we hold about you. This does not include deleting any data we are obliged to keep for administrative, legal, or security purposes.

Data breach procedures

Our data is stored on a secure cloud platform and is protected with reasonable technical and process controls. We cannot guarantee the security of information but will notify suitable authorities of data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

Contact information for privacy issues

Please contact us at privacy@stpauls.org.nz about any issues relating to this information.

Changes to these protocols

We reserve the right to make any changes to this information and the St Paul's Privacy Policy and Privacy Statement as necessary.

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