

## **Geards FuneralsLtd Privacy Policy**

Geards Funerals Ltd (**GF**) takes your privacy seriously, and GF ("we", "us", "our", etc) are committed to protecting your personal information. We recognise the importance of keeping your personal information confidential and secure.

Personal information is information by which you may be identified directly, or which has the capacity to identify you.

This Privacy Policy describes how we collect and hold your personal information, how we deal with your personal information, who we disclose it to, and how you can access the personal information we hold about you.

We have adopted this Privacy Policy to ensure that we deal with your personal information in accordance with the Privacy Act 1993 (as amended from time to time) (**Act**).

### **Introduction**

GF is a business providing funeral services (**Services**).

We also work with other service providers so that we can provide our Services to you.

### **Personal Information we collect and hold**

We collect, hold, use and disclose personal information about you in the course of carrying out our businesses, including providing our Services.

Depending on your interactions with us, the personal information that we may collect, and hold includes:

- your name, address, email address, contact details;
- payment information;
- any additional information you provide, such as when you contact us;
- a record of any queries you have made or communications you have with us, including telephone calls made to us or by us, and details of such recording (and use of) are explained below in the "Call Recording" section;
- credit and repayment history information;
- any other information that you authorise us to collect; and
- information in relation to a deceased (which includes instructions for the Services, cause of death medical certificate, medical practitioner's certificate for cremation, and information required for Births, Deaths and Marriages).

Where you engage GF on someone else's behalf, we will collect information regarding your relationship to such person as well as your authority to act on their behalf. You are also deemed to have authority to provide the person's personal information to us and to have confirmed we may deal with that person's personal information in accordance with this Privacy Policy.

We may also collect other information which is not necessarily personal information, including your IP address, cookies, and information about your device, browser and operating system.

You can choose to withhold personal information, but this may restrict the Services we can provide to you.

### **Collection of Personal Information**

We may collect information about you:

- from you when you provide that personal information to us, through any registration, through any contact with us (e.g. telephone call or email), or when you enquire about our services, or use our services; or

- from publicly available information.

We may also collect personal information about you from third parties where you have authorised this, such as a person who has engaged GF for our Services on your behalf, other related entities and organisations which provide services to us, including credit reporting agencies, debt collection agencies, identification service providers, hospitals or hospice care, and any other third parties with your consent.

When you provide us with your personal information, you are consenting to our use of such information and our right to disclose it to third parties.

### **Storage of Personal Information**

We will take reasonable steps to protect and keep secure the personal information we hold; however, no method is completely secure, and we are not responsible for any breach of security caused by external parties.

GF holds personal information in various formats, including electronic and physical forms, on servers, cloud-based storage, databases, and filing systems.

GF may need to provide personal information to a third party operating outside of New Zealand for the purposes of storage or processing personal information. The countries where third parties may be located includes Australia, the United States of America, and any other country where GF engages third parties for these services. Where GF provides personal information to these third parties for the purposes of storage or processing, they will be treated as an agent of GF in accordance with the Act and GF will fundamentally be accountable for that agent's compliance with the relevant provisions and/or key Privacy Principles of the Act in relation to that personal information.

Access to GF cloud service is protected by strong password requirements, as well as 2-factor authentication.

Physical access to GF cloud service provider's servers in Australia is guarded 24/7 by personnel, biometric scanning, CCTV, and activity logging.

GF also has strict confidentiality standards that control which staff members can see your personal information and what they're allowed to do with it.

### **Use of Personal Information**

We may use personal information for the following purposes:

- to process, assess or acknowledge, any request for Services you have made with us;
- to provide any Services and to communicate with you regarding such Services;
- to assess your credit worthiness, collecting or recovering any payments or other amounts from you, monitoring your compliance, or to better service you;
- to collect any outstanding debt from you;
- to market our products and services including future products and services which we believe may be of interest to you including by email, unless you tell us not to as detailed below under "Marketing and Opting Out";
- to undertake market research related to our product and services or future products and services for the benefit of our customers;
- to share your personal information with third parties where you have consented for that information to be shared with them;
- to train our staff, monitor and maintain our systems and networks;
- for our internal purposes such as risk management and billing;
- to respond and follow up on any queries, complaints or requests you might have made;

- to comply with our obligations under any laws in New Zealand, which includes tax and accounting records, information required by Births Deaths and Marriages (including cause of death), and information about the collection of ashes; and
- any other purpose you have consented to, or authorise.

### **Call Recording**

We may record telephone calls between you and us for the following purposes:

- quality assurance;
- to have a record and report on the number and types of enquiries GF receives;
- staff training so that we can consistently provide, and improve our service; and
- to ensure that we have an accurate record of your call.

We will store all such recordings securely.

### **Disclosure**

Generally, we do not disclose personal information to third parties for them to use for their own purposes. We may disclose your personal information in accordance with this Privacy Policy, and otherwise only with your consent:

- to the advisers, consultants, data storage service providers, other service providers and contractors we ordinarily engage for the above purposes (such as mailing houses, insurers, printers, lawyers, accountants and other such service providers);
- to the other service providers involved in the provision of our Services to you including florists, caterers, websites for online publication(s) and other publisher(s), city or regional councils, crematoria, celebrants, venue providers;
- to credit reporters or credit reporting agencies, including for the purpose of obtaining a credit report about you and/or to allow the credit reporting agency to maintain a credit information file containing information about you;
- to a debt collection agency;
- to any person where disclosure is required or authorised by law; and
- to any other person or entity to whom you have consented us to disclose your personal information.

In general, the third-party providers we use will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

We may also disclose your credit information, including account information, default information, repayment history (including whether payments are made on time) and identification information to credit reporting agencies.

Information disclosed by us to credit reporting agencies may be listed in their systems, used by them to provide their credit reporting services or other information services, and supplied to their customers who use their services to make credit decisions about you or any applicable organisation you are representing.

### **Access or Correct Your Personal Information**

You are responsible for promptly informing GF of any change to your personal information. If the information held by us is incorrect, inaccurate, incomplete or not up to date, then you may ask us to correct the information and we will either correct the information or make a record of your comment, as we think appropriate.

Subject to certain grounds for refusal set out in the Act, you have the right to request access to any of your readily retrievable personal information we hold about you. Where we hold information that you

are entitled to access, we will endeavour to provide you with a suitable range of choices as to how access is provided (e.g. emailing or mailing it to you).

You can request access to or correct your personal information by contacting us at the address below.

When you contact us, you should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

### **Third Party Partners and Analytics**

We may collect information about you when you visit our website or social media pages. We promote our products and services on our websites and on social media. Third party vendors, including Google, show our advertisements on sites throughout the internet. Both us and these vendors may use cookies, separate to those required to maintain secure connections, to assist in serving the most relevant available GF advertisements to you based on your prior visits to our websites. You do not need to accept these cookies to transact with us and you can opt out of Google's use of cookies by visiting the Google Analytics Opt-out page.

Throughout our public websites, the Google Analytics system is used to measure anonymised site activity, associating multiple sessions across multiple devices. The information generated by these cookies (which includes your IP address) will be transmitted to and stored on the servers belonging to the companies providing us with analytic services (notably Google). These agencies may also transfer information gathered in this way to their agents or to other entities as required by law.

We also use other tools in order to better target advertising and our communications.

By using any of our websites you consent to the processing of data about you as explained above.

### **Links to other websites**

Our website may contain links to other websites. These websites have their own privacy policies and we have no responsibility for linked websites, or their communication with you, and provide them solely for your information and convenience. We suggest you review that site's privacy policy before you provide personal information.

### **Marketing and Opting Out**

Where we have obtained your consent to do so, or in circumstances where you would reasonably expect that your personal information would be used or disclosed for this purpose, we may contact you from time to time with marketing material about our other products or services. We may also share your personal information with our related companies, so that they can provide you directly with marketing material about their products and services. You may opt out of receiving this material at any time by contacting us at the address below.

Your consent to receive this information will remain current until you advise us otherwise.

### **Changes to this Privacy Policy**

From time to time we may need to amend the terms of this Privacy Policy if our practices change. We reserve the right to change this Privacy Policy at any time. If we do so, we will post the updated version on our website.

Your continued use of the website will indicate your acceptance of the updated policy.

### **Applicable law**

This Privacy Policy is governed by New Zealand law. Your personal information will be collected, used, stored, and disclosed in accordance with this Privacy Policy and New Zealand law. The courts of New Zealand have non-exclusive jurisdiction.

This Privacy 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](http://www.privacy.org.nz).

### **Privacy Concerns, Questions or Complaints**

If you have any questions about this Privacy Policy and/or our handling of personal information or you believe that we have at any time failed to keep one of our commitments to you to handle your personal information in the manner required by the Privacy Act, please lodge a written complaint addressed to our Privacy Officer using the contact details below:

Geards  
FuneralsLtd  
13 Pukpoto Road  
Kaitaia  
Email: [admin@geards.co.nz](mailto:admin@geards.co.nz)  
Telephone: 09 408 0970

Once we receive your complaint, we will respond to you within a reasonable period of time, usually within 20 working days.

We will respond and advise whether we agree with your complaint. If we do not agree, we will provide reasons. If we do agree, we will advise what (if any) action we consider appropriate to take in response. If you are still not satisfied after having contacted us and given us a reasonable time to respond, then we suggest that you contact the Office of the Privacy Commissioner by:

**Phon** 0800 803 909 (from 8.30am to 5pm, Monday to Friday)  
**e:** (04) 474 7595

**Post:** PO Box 10-094  
The Terrace, Wellington, 6143

**Email** [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)  
:

This policy was last modified on 9<sup>th</sup> March 2020