



Devlin+Cameron+Hayes

Chartered Accountants
and Business Advisors
Since 1973



Privacy Policy

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Purpose

This policy explains how Devlin Cameron and Hayes Limited (“DCH”) handles personal information and complies with the requirements of the Privacy Act 2020 (“Privacy Act”). If you have any further questions in relation to this policy, please contact our Privacy Officer at privacyofficer@dch.co.nz.

Collection of Personal Information

DCH collects and holds personal information from clients, suppliers, employees and other individuals. We collect and hold this information when it is necessary for business purposes. The main types of personal information DCH collects and holds relate to the contact details of our clients, suppliers and other business contacts. Typically, this information includes names, addresses, telephone numbers, e-mail addresses, AML documentation and job titles. In the course of providing professional services to our clients, we collect and hold more detailed personal information such as financial details. We collect most information directly from individuals when we deal with them. The personal information we collect may be provided in forms filled in by individuals, face to face meetings, telephone conversations or emails. If you contact us, we may keep a record of that contact. Because of the nature of our business it is generally impracticable for us to deal with individuals on an anonymous basis.

Use of Personal Information

The main purposes for collecting personal information are:

- To provide our services.
- To maintain contact with clients.
- To interact with and pay suppliers.
- To notify clients of industry changes that may be of interest to them.
- For recruitment.
- For general management and reporting purposes such as invoicing and account management.
- For employment purposes.
- Other purposes related to our business.

If we collect personal information in ways other than a stated in this policy we will ensure we do so pursuant to the requirements of the Privacy Act 2020.

Disclosure of Personal Information

DCH does not routinely disclose personal information to other organisations unless:

- You have given consent to;
- Use or disclosure is permitted by this policy;
- We believe it is necessary to provide you with a product or service which you have requested;

- To protect the rights, property or personal safety of any member of the public or a client of DCH;
- Such disclosure is otherwise required or permitted by law, regulation, rule or professional standard.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes. We do not sell or trade personal information with third parties.

DCH uses a range of service providers to help us maximise the quality and efficiency of our services and our business operations (including internal business requirements such as recruitment and human capital requirements). This means that individuals and organisations outside of DCH will sometimes have access to personal information held by us and may collect or use it for or on behalf of DCH. This may include, but is not limited to, consultants, off-site security storage providers and information technology providers. We require our service providers to adhere to our privacy guidelines and not to keep, use or disclose personal information we provide to them for any unauthorised purposes.

Privacy on our Websites and Applications

This policy also applies to any personal information we collect via our website www.dch.co.nz. In addition to personal information you provide to us directly, DCH may also collect personal information from you via our website.

Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners on the site. The use of cookies is now standard for most websites. If you are uncomfortable with the use of cookies, you can manage and control them through your browser, including removing cookies by deleting them from your browser history / cache when you leave the site. In most cases, you can refuse a cookie and still fully navigate our website.

In order to properly manage our website and applications, we may log certain statistics about the users of the facilities, for example the users domain name and browser types. None of this information specifically identifies an individual and it is used solely to ensure that our website and applications present the best possible navigational experience for users.

Because DCH wants your user experience to be as informative and resourceful as possible we provide a number of links to websites. DCH is not responsible for the privacy practices or policies for those websites. We encourage you to review each website's privacy policy, especially if you intend to disclose any personal information via that site. A link placed on the DCH website to another website is not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that website or advertised on that site.

Security of Personal Information

We will provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted for us to withhold this information (for instance, where granting access would infringe another person's privacy).

When you make a request to access personal information, we may require you to provide some form of identification (such as a driver's licence or passport) so we can verify that you are the person to whom the information relates. In some cases we may also request an administrative fee to cover the cost of access.

If at any time you want to know what personal information we hold about you, you may contact us by email at privacyofficer@dch.co.nz.

Access to Information

We may keep a record of your personal information, correspondence or comments in a file specific to you. We may utilise, disclose or retain your personal information for as long as necessary to fulfil purposes for which that personal information was collected and as permitted by law.

Corrections and Concerns

If you believe that information we hold about you is incorrect or out of date, or you have concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns.

If you wish to have your personal information deleted, please let us know and we will take reasonable steps to delete it (unless we need to keep it for legal, auditing or internal risk management purposes).

If DCH becomes aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact our Privacy Officer. If you are not satisfied with our handling of your problem or complaint you may make a complaint to the Office of the Privacy Commissioner.