

OUR PRIVACY POLICY

As part of doing business, we gather a lot of personal information about employees, contractors, customers and business partners. Under the law we are required to keep this information safe, and manage it carefully.

Your privacy is important to us. We respect your rights and our obligations regarding any private or personal information we gather or hold about you.

- We should only collect personal information that is required for a specific business purpose – this policy sets out the purposes for which information can be used.
- Our teams should only access personal information of others where that access is required for their role or function.
- Any personal information collected, used or stored by us has to be protected from unauthorised access, disclosure or loss.
- Managers will ensure that appropriate privacy processes are adopted within their business and area of responsibility.
- Personal or private information should be deleted, destroyed or identifying details removed when it is no longer needed.

Scope and purpose of this policy

This policy applies to all Hall's and Icepak employees; contractors and temporary workers, suppliers, visitors to our sites and to our websites. It is provided to help you understand how we collect, use, share, store or disclose the personal information we collect about you (personal information) and your rights associated with that personal information.

When we refer to "we", "us", or "our" in this Policy, we are referring to the relevant entity in the Hall's Group responsible for collecting and processing your personal information. This Policy does not limit or exclude any rights that you have or may have under the Privacy Act 2020 (Privacy Act).

Reporting a privacy issue to us

Any actual or suspected unauthorised use or access of personal information or breach of this policy or the Privacy Act 2020 must be reported to Hall's Privacy Officer immediately, by email to privacy@halls.co.nz.

If anyone contacts you with a privacy-related request, issue or concern – please direct them to email privacy@halls.co.nz with details of their request.

Policy detail

Personal information that we collect

We may collect the following personal information about employees, contractors, suppliers, customers or users of our websites:

- (a) name, phone number, residential address and email address;
- (b) date of birth, job title, place of employment or business;
- (c) next of kin contact details;
- (d) any communication you have with us, including via phone or email;
- (e) any camera footage collected by us on any of our sites or in any of our vehicles;
- (f) electronic driver logbook information which includes a record of hours worked by our drivers and breaks taken by our drivers;
- (g) fingerprint scanning data for payroll and timesheet capture;
- (h) information obtained during medical checks, drug and alcohol testing and ACC information;
- (i) medical certificates, specialist reports and police reports pertaining to injuries or accidents on our sites or relating to any services provided by us;
- (j) copies of any licences required by employees or contractors to drive our trucks and vehicles;
- (k) forklift and High Reach certificates for those in driver or storemen roles;
- (l) stay at work plans for employees or contractors returning to work from an injury;
- (m) progression information on driving class for employees in driver roles;
- (n) training records of employees;
- (o) information obtained by or submitted to us by you, including via our websites, career portals, customer portals or social media sites;
- (p) the URL which you just came from (whether this URL is on our site or not), what browser you are using and your IP address;
- (q) information collected by us through click tracking in relation to your use of the website or subsites, including the content you upload and the content you access;
- (r) aggregated data, which tracks traffic to the website or subsites; and
- (s) cookies

1. Other information we collect

We may also collect the following additional personal information in certain circumstances:

- (a) **Visitor Information:** If you are a visitor to any of our premises, you may be required to provide your name, the name of the company you work for, contact details and car registration for site health and safety purposes.

This information is held within our system for ease of future visits, but is not shared or distributed to third parties except where we may be required to disclose such information by legislation or other regulations, or to certain authorities in an emergency situation.

- (b) **Recruitment Information:** If you are a potential employee or contractor of the Hall's Group, you may be required to provide personal information so that we can assess your suitability. Information collected includes reference checking, curriculum vitae, previous employment or contracting history, evidence of passing all required drug and alcohol tests and any other information provided by you to us.

The application information and contact details of job applicants are held for a minimum of 12 months and used for the purpose of sending any future job opportunities. If a potential employee becomes an employee or contractor this information will be transferred to an electronic personnel file which will be kept in accordance with this policy.

- (c) **Vehicle Tracking Data:** If you are operating a company branded asset or vehicle or otherwise performing services for the Company in an asset or vehicle that is fitted with a GPS or other tracking device, we will collect information from such device for the purposes of:

- a. meeting our health and safety obligations, including incident and accident investigations;
- b. monitoring fatigue, refrigeration temperature, speed incidences and breakdowns;
- c. providing operational reporting (e.g., running efficiency costings, kilometre tracking and understanding costs);
- d. providing performance reporting to our customers; and
- e. tracking delivery runs in real time to understand, progress and answer customer queries about delivery ETAs.

Information collected may include details of any accidents, details of live location and kilometres travelled.

- (d) **Drug and Alcohol testing:** Where any employee or contractor of Hall's is required to be subject to random or other drug testing, the results of this testing is stored securely on the personnel file of the employee or contractor.

This information is held in accordance with this policy and our Hall's and Icepak [Drug and Alcohol Policy](#).

We do not collect sensitive information about you including details about your religious beliefs, sexual orientation or political information. We may request information about race, ethnicity or language preferences for the purposes of tailoring communications and for measuring our workplace diversity, but it would always be optional to provide such information.

If you choose not to provide information when we require (except where such information is clearly marked as optional), depending on the nature of your relationship with Hall's Group, you may not be able to be employed or engaged by us, use our services or our website or access our premises

2. Use of your information

Your personal information is generally used to help us manage and improve our services and business operations and to communicate with you. In addition to any other purpose set out in this policy, we will use the personal information for the following purposes:

- (a) in connection with the provision (or potential provision) of services to you;
- (b) in connection with the employment or engagement (or potential employment or engagement) of you;
- (c) to communicate with you;
- (d) to market our services to you, including contacting you electronically;
- (e) to undertake credit checks (if applicable and necessary);
- (f) to comply with our health and safety practices and policies and to meet our health and safety obligations under law;
- (g) to cooperate with any government industry, legislative or regulatory authorities;
- (h) to collect money that you owe us;
- (i) to protect or enforce our legal rights and interests, including defending any claim;
- (j) to improve, update and maintain our website or any of our services;
- (k) for any other purpose authorised by you and/or the Privacy Act; and
- (l) for such other secondary purposes which are directly related to the main purpose for which the personal information was collected.

We may send emails, promotional material or surveys to you where we believe it may be relevant to you. We will remove you from any such distribution or mailing lists upon your request.

3. Disclosure of your information

Unless expressly authorised by you or under this Policy, we will not disclose your personal information to any third party except for the following:

- (a) our related companies and affiliates;
- (b) third party contractors and providers of goods and services, such as courier companies, marketing and promotion companies, vehicle tracking and fleet management companies, recruitment companies, training and training certification agencies, business support services (i.e., storage and handling of documents and data) and information technology service providers;
- (c) insurance companies;
- (d) professional service firms providing services to us, such as legal or accountancy services; and
- (e) any third party as required by the Privacy Act or other legislation, such as to regulatory agencies.

4. Security and Retention

We will take all reasonable steps to ensure that the personal information collected, used or disclosed in accordance with this policy is accurate, complete, up to date and stored in a secure environment protected from unauthorised access, modification or disclosure.

- We have physical, electronic and managerial processes in place to safeguard the information we collect online.
- We will hold personal information collected in accordance with this Policy only for so long as we are legally entitled to do so.

5. Access and removal of Information

You have the right to seek access to and request correction of any personal information held about you by contacting us at privacy@halls.co.nz. There are some exceptions to this right set out in the Privacy Act.

If you make an access request, we will ask you to verify your identity and, if it is not clear from your request, specify what information you require and whether the request is urgent.

We will endeavour to respond to all non-urgent requests within 20 working days after the day on which we receive the request. We may charge a reasonable fee to cover the costs of meeting your request.

6. Policy updates

We reserve the right to change this policy at any time. By continuing to be employed or engaged by us or use our website(s) and/or services (as applicable to your relationship with us), you agree to be bound by the Policy that is in effect at that time. It is recommended that you check from time to time to see if the Policy has changed.

7. Disputes relating to privacy of your information

Should you wish to raise a concern or complaint you can contact us on privacy@halls.co.nz. We will work to resolve any issues to your satisfaction.

After this, if you feel that we have not addressed your concerns sufficiently, you may contact the Office of the Privacy Commissioner by lodging a complaint form online or posting it to:

Office of the Privacy Commissioner
PO Box 10094
Wellington 6143

This policy is due to be reviewed and updated in February 2023