# **PRIVACY POLICY**

This Privacy Policy was updated July 2021

Highlanders Rugby Club Limited Partnership ('HRCLP', 'we', 'us', 'our') respects the privacy of the individuals in relation to whom we collect, use, disclose and hold personal information and is committed to managing personal information in accordance with the Privacy Act 2020.

This Privacy Policy sets out how we handle your personal information (including the collection, storage, use and disclosure of your personal information), how you can access and change your information and how you can provide us with feedback or make a complaint.

We reserve the right, at our discretion, to modify or remove portions of this Internet Privacy Policy at any time. This Internet Privacy Policy is in addition to any other terms and conditions applicable to the web site.

# Your Rights

We'll only use your Personal Information for the reasons that we collected it, and in accordance with this Privacy Policy. If we don't need your Personal Information anymore for those reasons, then we'll stop using it.

If you don't agree with our Privacy Policy or don't want us to collect your Personal Information, then you shouldn't use our Website, Services or interact with us. If you change your mind and don't agree with our Privacy Policy anymore, then you should stop using our Website, Services or interacting with us.

# How we collect information about you

- Directly from you when:
  - you register for any HRCLP online services
  - you subscribe to emails from us;
  - you make enquiries of us; or
  - you communicate with us directly or through social media or other third party accounts that you have linked to your HRCLP registration
  - you respond to surveys, or requests for information
- From other people or organisations when you authorise us to contact them to obtain personal information about you.
- Through your use of our website.

# The kind of personal information we collect

We only collect the personal information you give to us or authorise us to collect from other people or sources. The information we collect may include your name, address, email address, phone number, gender, date of birth, purchase history and IP address (including country IP address originates from). We may also collect any other personal information you may choose to provide to us or authorise other persons to provide to us.

- We may also collect information about:
  - your preferences for receiving email updates, marketing communications and other subscription information; and
  - any other personal information you may choose to provide to us, or authorise other persons to provide to us.

If you choose not to provide us with personal information, we may be unable to provide access to certain content or services.

Please don't give us Personal Information about someone else unless you have their permission and they know about this Privacy Policy.

# How we use your personal information

We will primarily use and disclose your personal information:

- to provide you with information about events (including our games) and competitions that you register to attend and renewal opportunities (if applicable);
- to provide you information or a response to any enquiries or messages you send to us, either verbally or written;
- to administer your account with us
- to maintain and operate our website, including tracking and analysing user activity on the HRCLP website,
- to comply with our legal obligations, and
- for any other purpose that we notify you of at the time your personal information is collected.

We may communicate with you by email or, where you provide us with your phone number, by phone call or text/picture/video message.

#### Media

Photographs and/or video will be taken at each Game Day and various promotional events. By attending any HRCLP events you grant the event organisers full rights to use the images resulting from the photography/video filming, and any reproductions or adaptations of the images for publicity or other purposes to help achieve the Club's aims. This might include (but is not limited to), the right to use them in printed and online publicity, social media and media releases. If you do not wish to be photographed please inform an event organiser.

# **Third Party Links**

Occasionally, at our discretion, we may include or offer third party products or services when we supply tickets. These third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites.

# **E-Communications**

You consent to receiving information from us about our Products, Services, promotions and competitions via email, text message and social media. If you want us to stop sending you electronic communications, then you can simply unsubscribe at any time by following the instructions included in the electronic communication.

#### Withdrawing consent

If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

#### Restricting processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you object to us doing so. If you are entitled to restriction and if we've shared your personal information with others, we will let them know about the restriction where it is reasonably possible for us to do so.

# Right to object

You can ask us to stop processing your personal information, and we will do so, if we are

- processing your personal information on the basis of the legitimate interests of us or a third party, unless
  we can demonstrate overriding compelling legitimate grounds for the processing, or the processing is
  required for the establishment, exercise or defence of legal claims; or
- processing your personal information for direct marketing purposes.

#### How we may share your personal information

We may share your personal information with people and organisations that we may appoint to carry out administration, competitions, events, processing and other services on our behalf. These service providers will not be authorised by us to use or disclose your personal information except as necessary to perform services on our behalf, or to comply with legislation.

We may also disclose your personal information for the purposes of safety and security to relevant law enforcement bodies, or as may be authorised by you.

# **Cookies and analytics**

Like many other website operators, we may use 'cookies' on the HRCLP website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and are used to record how you navigate the HRCLP website on each visit, including providing us with information about pages and advertisements (including click through from emails) which have been viewed, how frequently particular pages are visited and the most popular areas of our website.

We may use cookies to enrich your experience of using our website by allowing us to develop and improve our website to reflect your interests by tailoring what you see to reflect what we have learned about your preferences during your visits to our website. This will mean some of your stored browsing history can be accessed by us.

In addition to cookies, we may use Google Analytics and other tracking software including, but not limited to, Google, Facebook, Instagram and Twitter retargeting throughout our website to understand and optimise user experience and to improve our advertising. This tracking software collects and analyses certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behaviour and usage information, and other similar information.

We and any of our third-party analytics service providers may:

- use cookies to anonymously track and target advertising based on your browsing behaviour; and
- use the cookies of that analytics service provider together with the cookies of another analytics provider to inform, optimise, and serve ads based on a user's past visits the HRCLP website.

The HRCLP website may also detect and use your IP address or domain name for internal web traffic monitoring and capacity purposes, or to otherwise administer our website, but no personal information is collected.

Patterns of use by visitors to our website may be tracked for the purposes of providing improved service and content based on review of user's website traffic patterns.

# Turning off cookies and opting out of analytics

You do not have to accept cookies and can change your browser settings to prevent cookies being stored on your computer. But if you do turn cookies off this will limit the service that we are able to provide to you and may affect your visitor experience.

For further information on cookies and how to switch them off see www.allaboutcookies.org.

You can opt-out of Google Analytics using the ads settings at (www.google.com/settings/ads).

# Storage and security

We will only hold your personal information for as long as necessary for the purposes for which it was collected (unless otherwise required by law).

We will take reasonable steps to store your personal information safely and securely against loss, unauthorised access, disclosure, use, modification or other misuse. However, we cannot guarantee the security of information you provide to us via electronic means as information sent over the internet may be unsecure.

# **Overseas disclosures**

Your personal information may be held by us in New Zealand. It may also be held on our behalf by service providers who are located both in New Zealand and overseas.

#### Accessing and correcting your personal information

You are entitled to request access to, and the correction of, the personal information we hold about you.

If the information you have requested can be readily retrieved, and subject to any lawful grounds for withholding, we will provide you with a copy of the personal information you have requested.

You may update or correct your personal information by contacting us in writing or by email. If we agree with the correction requested, we will make the change. If we do not make the correction requested, you can ask for your request to be kept with the personal information of yours that we hold.

#### Requesting erasure of your personal information

You can ask us to delete or remove your personal information in some circumstances, such as where we no longer need it, if you withdraw your consent (where applicable) or you validly object to the processing. If you are entitled to erasure we will comply with your request as soon as reasonably practicable. Note, even after our reasonable efforts to erase, there may be some residual information that could remain within our databases and other records which is not removed. We may also need to retain certain information for recordkeeping purposes, for compliance with our legal obligations, for the establishment, exercise or defence of legal claims and/or to complete any transactions started before your request is received. If we have shared your personal information with others, we will let them know about your request where reasonably possible.

# Obligation of HRCLP to notify privacy breaches

If HRCLP has a privacy breach that has caused serious harm to you (or is likely) to do so, we will need to notify the Office of the Privacy Commissioner and any affected people (including you) as soon as possible after becoming aware of the privacy breach.

# Privacy Policy review and update

We may, from time to time, amend or update this Privacy Policy. Any changes to this Privacy Policy will be available on the website this Privacy Policy is located. If you continue to use our Services or continue to visit our Website or interact with us after the updated Privacy Policy comes into effect, then this will indicate that you have agreed to our changes.

If you don't agree with the changes to the Privacy Policy, then you should immediately stop using our Services and our Website.

We encourage you to review our Privacy Policy periodically for any changes.

# Contact us

You can contact us at any time regarding your personal information through our Privacy Officer who can be contacted by the following means:

Postal Address: Highlanders Rugby Club Limited Partnership, PO Box 6070, North Dunedin, 9059

Email: privacyofficer@highlanders.net.nz

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