



## WEL Networks Privacy Policy

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### Overview

WEL Networks Limited. (WEL) collects personal information relating to both customers and the general public as a part of its business activities. WEL is committed to ensuring that the collection, use, correction, disclosure and disposal of personal information complies with the principles of the Privacy Act 1993.

### Scope and Application

This policy outlines how WEL manages personal information collected from WEL customers and the public.

WEL collects personal information from several sources, including third parties, which may be stored and used in a range of ways by WEL. The list includes, but is not limited to:

Customer Information	Information obtained from mail, website, email, telephone and other sources required to deliver WEL goods and services to you including any billing activity; Administration of your account, including participation in consumer promotions; Dealing with your queries, network and supply faults and maintenance, contract management, credit and debt management and complaints; Note: Customer service calls may be monitored and recorded.
WEL Smart Meters	Information, when associated to an individual, about electricity quality parameters and usage to optimise network reliability, to assist in network performance monitoring and to enhance fault resolution, and where appropriate for billing purposes; Smart meter data may be shared with third parties as part of standard electricity billing process or as required by the electricity market; Research and analysis of trends and demographics to optimise network management and improve services.
CCTV Cameras	Recording of security footage at our sites to monitor site safety for staff and the public, and to detect and deter criminal behaviour and acts, and to support safety incident investigations; Incidental footage taken from unmanned aerial vehicles during operations on the network to monitor the network assets
Electric Vehicle (EV) Chargers	Recording usage and payment activity and information; Chargers may also be monitored by CCTV for the safety and security of the public and installed equipment and to detect and deter criminal behaviour and acts.

Personal information will be kept in secure systems with access restricted to WEL personnel and contractors who require it for their role. However it may be disclosed without your consent (as permitted under the Privacy Act 1993) for the following reasons:

- to prevent a serious and imminent threat to public health or public safety;
- for the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation) or for enforcement of the law.

Requests for bulk downloads of customer information should be directed to the WEL Privacy Officer (see contact details below). Requests for bulk information will only be considered if a net benefit can be demonstrated to the customers who will have provided the core data. Requests from educational institutions solely for educational purposes will be considered on a case by case basis. All supplied bulk downloads will be anonymised and aggregated, unless otherwise agreed by WEL.





## Policy Principles

Use of personal information will be in accordance with the following principles:

- All reasonable steps will be taken to ensure that personal information collected and retained by WEL is accurate, complete, secure and protected from unauthorised access, modification and disclosure.
- At times, relevant personal information will be shared with third parties. We will only disclose personal information to:
  - WEL subsidiary companies to use for the same purposes as us
  - Service providers who undertake services on behalf of WEL
  - Electricity market participants to allow for the proper function of the market registry, pricing, reconciliation and billing processes
  - Credit reference agencies and debt collection agencies (as outlined in the terms and conditions of application for credit and debt)
- Personal information will only be used for the purposes for which it is collected. This includes information provided to WEL by third parties.
- CCTV cameras will be installed in alignment with the Privacy Commissioner's publication: Privacy and CCTV; A guide to the Privacy Act for businesses, agencies and organisations.
- CCTV cameras will operate for 24 hours per day and data will only be stored on a dedicated self-overwriting disk. This means that no more than about 35 days of video data is stored.
- You may request access to the personal information WEL holds about you by contacting the WEL Networks Privacy Officer by email ([privacy@wel.co.nz](mailto:privacy@wel.co.nz)) or by mail to The Privacy Officer, WEL Networks Ltd., PO Box 925, Hamilton, 3240. Include details of your name, address and the information that you require. You may request that the information WEL holds is corrected if the information is found to be incomplete or incorrect. There may be a charge for these services.
- You have the right to appeal to the WEL Networks Privacy Officer or the Privacy Commissioner if you suspect your rights have been infringed in the collection, use, disclosure or management of your personal information.
- WEL will take all reasonable steps to securely destroy personal information once it is no longer needed for the purposes for which it has been collected.
- Unauthorised use or release by WEL personnel or contractors of our customers' personal information is prohibited under WEL's internal Human Resource policies.

## Related Documents (optional)

- Privacy Act 1993
- Privacy and CCTV; A guide to the Privacy Act for businesses, agencies and organisations

A handwritten signature in blue ink that reads 'Garth Dibley'.

Garth Dibley  
Chief Executive  
July 2020

