

WEL Networks Privacy Policy

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 2020, (the Act).

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 obtained from mail, websites, email, telephone and other sources required
Information	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 electricity supply faults and maintenance, contract management, works, 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 public, to

detect and deter criminal behaviour and acts, and to support incident investigations; Incidental footage taken from unmanned aerial vehicles during operations on the

network to monitor and inspect network assets or other authorised activity

Electric Vehicle (EV) 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 Act) 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. 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. All supplied bulk downloads will be anonymised and aggregated, unless otherwise agreed by WEL.

Policy Principles

Use and management 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.

- Personal information will only be used for the purposes for which it is collected. This includes information provided to WEL by third parties.
- At times, 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)
- 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 at WEL sites will operate for 24 hours per day and data will only be stored on a dedicated selfoverwriting disk. This usually 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 (<u>privacy@wel.co.nz</u>) 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. WEL will have to satisfy itself of your identity and there may be a charge for these services prior to information being released.
- 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.
- Breaches of privacy and unintentional release of personal information will be assessed using the Privacy Commission's process called "NotifyUs". This allows assessment of the significance of the breach and whether the breach has caused anyone significant harm, and thus be notified to the Commission.
- Unauthorised use or release by WEL personnel or contractors of our customers' personal information is prohibited under WEL's internal Human Resource policies.

Cookies and Internet Analytics

The WEL website and customer portal use non-persistent and persistent cookies to manage and improve the customer experience when the sites are visited. By enabling cookies visitors are able enjoy all features of these sites. The WEL website and customer portal also use services such as Google Analytics to analyse use and provide trends and statistics to WEL. Google uses cookies to collect standard web log information and visitor behaviour information (in an anonymised form). WEL does not control Google use of this data including how those cookies are issued, or the data stored.

Related Documents

Privacy Act 2020

It laley

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

Garth Dibley Chief Executive December 2020