



Freightways Group Privacy Policy

Policy owner: Freightways Privacy Officer

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1. Definitions

“**Business Unit**” refers to the various New Zealand marketing brands and/or operating companies of Freightways and includes:

NZ Couriers, PostHaste Group, PostHaste Limited, CastleParcels, Pass The Parcel, Now Couriers, Messenger Services, Stuck, SUB60, Kiwi Express Couriers, Kiwi Drive, Security Express, DX Mail, DataPrint, Parceline, FieldAir, TIMG NZ, BigChill, Freightways Express, Freightways Information Services.

“**Freightways**” or “**we**” refers to Freightways Express Limited and its various Business Units.

“**Freightways Users**” are Directors, employees and contractors of Freightways and its Business Units, as well as any third parties who process Personal Information on behalf of Freightways or its Business Units.

“**Information Privacy Principles**” are the privacy principles, rules and guidelines Freightways adhere to when processing personal information.

“**Privacy Act**” refers to the Privacy Act 2020 effective from 1 December 2020.

“**Personal Information**” is any information which tells us something about a specific individual. The information does not need to name the individual, as long as they are identifiable in other ways, like through their home address.

Each Business Unit has a “**Privacy Facilitator**” who is the main point of contact for all privacy related matters within that business unit and is responsible for liaising with Freightways’ Privacy Officer where escalations are required.

A “**Privacy Breach**” is when Personal Information is either inappropriately: disclosed, altered, lost, or accessed. Loss includes either the destruction of information or the temporary inability to access information.

Freightways’ “**Privacy Officer**” is responsible for all privacy related matters across Freightways on behalf of the leadership team, monitoring compliance, acting as the contact for the Office of the Privacy Commissioner for breach notification, complaints and other enquiries and to ensure Freightways complies with the provisions of the Privacy Act.

2. Purpose

Freightways Express Limited (“Freightways”) considers the protection of privacy to be of utmost importance and this Privacy Policy (“Policy”) is an essential part of ensuring Freightways and its Business Units promote an individual’s confidence that their personal information is protected and will be treated properly. Managing personal information is important to Freightways in building trust and confidence with individuals while also maintaining compliance with the requirements of the Privacy Act.

The purpose of this policy is to provide a privacy framework, including how Freightways will collect, store, use, disclose and dispose of personal information (the “Information Privacy Principles”).

3. Scope

Freightways complies with the New Zealand Privacy Act 2020 and any other privacy and data protection laws where applicable.

This policy applies to all Directors, employees and contractors of Freightways, as well as any third parties who process personal information on behalf of Freightways (collectively known as “Freightways Users”).

This policy covers all personal information regardless of whether it relates to:

- Customers
- Employees
- Contractors
- Members of the public

4. Related Documents

The following documents are related to this policy:

- Privacy Breach Policy
- Privacy Impact Assessment
- Information Management Retention Policy and Disposal Schedule
- Privacy Act Access and Correction Request Process
- Privacy Complaints Process
- Third Party Assessment Process.

5. Information Privacy Principles

5.1. Collecting Personal Information

We will only collect the minimum personal information necessary for its business purposes. We will not collect information where it is not necessary.

We will endeavour to collect personal information:

- Directly from the individual it is about
- In a way that is fair in the circumstances
- In a way that does not intrude to an unreasonable extent on the personal affairs of the individual whose information is being collected.

We will take reasonable steps to inform individuals about what information we are collecting, why and key details about how we will treat it (in the form of a “Privacy Notice”) prior to collection. The privacy notice will include the consequence for not providing the personal information and information about the individuals rights to access and correct personal information.

5.2. Storage and Retention of Personal Information

Freightways users must take all reasonable steps to protect personal information from loss, unauthorised access, disclosure, or misuse.

We will not store personal information for longer than is necessary for a lawful business purpose and will dispose of it when it is no longer needed. Information should be maintained consistently in accordance with our ***Information Management Retention Policy and Disposal Schedule***.

5.3. Access to Personal Information

Individuals have the right to access information about themselves. A request can come from a customer, an employee, or any other individual. They do not need to cite the Privacy Act for it to be an appropriate request. Any request for personal information must be notified to the Freightways’ Privacy Officer, and the Freightways’ Privacy Officer can guide the request and advise you on appropriate withholding grounds if they apply, in each case in accordance with the ***Privacy Act Access and Correction Request Process***.

As a general principle, unless there are valid reasons why we would not disclose that information (as prescribed by the Privacy Act), we will provide access to Personal Information we hold about any individual if they request that information.

All employee personal information requests should also be notified to the [privacy facilitator](#) for your brand. If you want to access your own personal information you should make the request of your manager or your [privacy facilitator](#).

All requests for access must normally be completed within 20 working days unless they are extended by the Freightways' Privacy Officer, who will consider factors such as the volume and complexity of material requested.

5.4. Correction of Personal Information

Individuals also have the right to correct personal information about themselves. These requests can be of simple facts (for example, an address) or more complex issues (such as a file note saying a customer was aggressive). In any instance we need to consider the request to correct the information and take appropriate action. If we do not agree that the information is incorrect, we do not need to correct it, but we must clearly note the individual's view that the information is incorrect prominently next to the contentious information.

All correction requests must be made in accordance with the ***Privacy Act Access and Correction Request Process***.

5.5. Use and Disclosure of Personal Information

We will not use personal information without first considering whether it is reasonably accurate, up-to-date, and complete.

We will only use personal information where it is lawful to do so. Primarily this will be where we are using personal information for the reason it was initially collected.

We will not use an individual's personal information for training or for system testing purposes.

We will not disclose personal information unless we have a reasonable basis for believing doing so is lawful. This will usually be where the disclosure is for the purpose the information was collected or because it is authorised by the individual. Other exceptions apply and if you are uncertain you should discuss these with your Business Unit Privacy Facilitator or Freightways Privacy Officer.

We will not disclose personal information overseas unless it is protected by equivalent safeguards to in New Zealand. For guidance on any overseas disclosure of personal information you should consult with Freightways Privacy Officer.

6. Privacy Breaches

We have clear, consistent processes for reporting, managing and escalating privacy incidents. For any suspected privacy breach, you must immediately follow the ***Privacy Breach Process***.

A privacy breach is when Personal Information is either inappropriately: disclosed, altered, lost, or accessed. Loss includes either the destruction of information or the temporary inability to access information.

Where the Business Unit Privacy Facilitator confirms that there has been a privacy breach, and they believe it has, or may have caused, or is likely to cause, serious harm, the Business Unit Privacy Facilitator must notify Freightways' Privacy Officer.

All privacy breaches or suspected privacy breaches must be recorded in a central privacy breach log.

7. Third Parties

Where we contract with a third-party to outsource the processing of personal information you must ensure that the personal information is protected by equivalent safeguards to when it was managed by us. Agreements must require the contracted party to meet our privacy requirements for example:

- Process personal information on our behalf only for those purposes instructed by us
- Notify us of any privacy breach
- Maintain security safeguards
- Only retain information for a specified period
- Not sub-contract the processing to a lower standard than is agreed in the contract.

The ***Third-Party Assessment Policy*** details how we assess and manage third parties from a privacy perspective.

8. Complaints

Where you become aware of a complaint about privacy or the management of personal information you must immediately notify your Business Unit's Privacy Facilitator in accordance with the ***Privacy Complaints Process***.

The Privacy Facilitator must notify Freightways Privacy Officer.

9. Privacy Impact Assessments

If you are considering a new process, policy, product, service, or system that changes how we collect, use, store, disclose or dispose of personal information you must consider the privacy impacts and risk.

To initiate this, you should contact your Business Units Privacy Facilitator outlining the proposal and any anticipated risks. The Privacy Facilitator or Freightways Privacy Officer may ask that you undertake a ***Privacy Impact Assessment***.

If a Privacy Impact Assessment is required, it must be signed off by the relevant business owner and Freightways' Privacy Officer before the process, policy or system is brought into effect.

10. Training and Education

We will train those employees and contractors working with personal information as well as ensuring that all employees undertake regular training on privacy risk areas specific to their business area, as well as broader privacy best practices.

11. Process Review

We commit to retaining up to date privacy processes. Our business processes relating to the collection, access and correction, use and disclosure, storage and disposal of personal information will be regularly reviewed, at least annually.

12. Accountabilities and Responsibilities

The Board is committed to managing personal information by:

- Setting clear expectations regarding privacy and protection of personal information, and communicating them to the leadership team
- Holding the leadership team accountable for meeting those expectations
- Ensuring that effective privacy risk management is fully embedded within Freightways overall risk management activities
- Employing high-quality monitoring and information management practices.

Freightways' Privacy Officer, on behalf of the leadership team, is accountable for:

- Promoting privacy within Freightways
- Monitoring compliance and to assist with access and correction requests
- Monitoring and advising on Privacy Impact Assessments
- Being the point of contact for the Office of the Privacy Commissioner for breach notification, complaints and other enquiries
- Assisting with Privacy Breaches or any complaints raised about privacy
- Ensuring that Freightways complies with the provisions of the Privacy Act.

Each Business Unit has its own Privacy Facilitator whose role is to:

- Notify privacy incidents to accordance with the Privacy Breach Process
- Proactively assess and manage privacy risk within the Business Unit
- Ensure Business Unit employees are aware of and recognise the importance of their role in privacy
- Ensure employees are aware of and compliant with the Privacy Policy, and the Privacy Act; and
- Ensure new employee induction includes privacy training.

Freightways Users have individual responsibility to:

- Maintain best practice privacy behaviours
- Report all privacy breaches and near misses to their manager
- Promote privacy at work
- Comply with all privacy policies and guidelines
- Actively participate in privacy training
- Identify privacy risks.

13. Monitoring and Governance

Our privacy policies and guidelines have been established to comply with the Privacy Act 2020. The monitoring and oversight of privacy follows a three lines of defence model to provide assurance that privacy risks are being managed effectively under different situations:

- The first line of defence is formed by managers and employee responsible for identifying and managing risks as part of their duties.
- The second line of defence is formed by privacy and internal governance policies, frameworks, tools and techniques to support privacy to be maintained.
- The third line of defence is formed by internal and external audits ensuring that the first two lines of defence are operating effectively and identifying opportunities for improvement.

14. Non-Compliance

Non-compliance of the terms of this policy may result in disciplinary action or dismissal.

15. Contact

Any privacy related concerns or requests for information should be initially directed to your Business Unit Privacy Facilitator. A list of Privacy Facilitators can be found [here](#).

Where required you can also contact Freightways Privacy Officer privacy@freightways.co.nz.

16. Review of Policy

The Freightways' Privacy Officer is responsible for maintaining this policy.

This policy is reviewed every 3 years and is approved by the Audit and Risk Committee.

Date of this Policy: December 2020

Next Review of this Policy: December 2023

17. Approval

Approved by the Freightways Board Audit and Risk Committee on 26th November 2020.