

# Privacy Policy

## Kaupapahere Tūmataitinga

### Purpose

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The purpose of this policy is to set out how we collect, store, use, process and disclose personal information in connection with services.

By providing us with your personal information, you agree to the collection, storage, use and disclosure of your personal information in accordance with this Policy.

### Our Policy / Policy Statement

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The Lines Company Limited and its related entities (referred to in this Privacy Policy as “TLC”, “we”, “us” or “our”) are committed to protecting your Personal Information and ensuring compliance with the New Zealand Privacy Act 2020 (“**Privacy Act**”) (if you are in New Zealand) and the European Union’s General Data Protection Regulation (“**GDPR**”) (if you are in a Member State of the European Union).

Our Privacy Policy applies to anyone who visits our website (<https://www.thelinescompany.co.nz/>) (**Website**), uses the products and services we supply (**Products** and **Services**) or interacts with us.

If you have any questions, you can contact our Privacy Officer at [privacy@thelines.co.nz](mailto:privacy@thelines.co.nz).

**Personal Information** means any information relating to an identified or identifiable natural person.

### Roles and Responsibilities

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- This policy applies to all employees in the TLC Group.
- The Privacy Officer is Simon Batters, GM – People & Safety.

### Guidelines / Heading

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#### 1. YOUR INFORMED CONSENT

- 1.1 We’ll only use your Personal Information for the reasons 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.
- 1.2 Signing up to our website, services or agreeing to interact with us means you agree with our Privacy Policy. You can also opt-out of receiving marketing communications from us by clicking on the ‘unsubscribe’ link in the email communication.
- 1.3 For the purpose of:
  - (a) The GDPR, the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.
  - (b) The Privacy Act, your Personal Information will only be used for the purpose for which it was collected in accordance with this Privacy Policy. If that purpose no longer exists or your Personal Information is no longer needed for the purpose in which it was collected, then we will no longer use your Personal Information.

## 2. DATA CONTROLLER

2.1 The “data controller” (for the purpose of the GDPR) and the “agency” (for the purpose of the Privacy Act) that will be collecting, using, disclosing, storing and processing your Personal Information is The Lines Company Limited (NZBN 9429038879517) and Influx Energy Data Limited (NZBN 9429037465971) both based in New Zealand.

2.2 You can contact us at any time by clicking [Contact us](#) on our Website.

## 3. INFORMATION TLC COLLECTS ABOUT YOU

3.1 The table below outlines the 4 general categories of information that we collect for processing and the legal basis on which that information is processed:

Category		Types of personal information collected	Legal Basis for Processing
<p><b>Information you give us</b></p> <p>You may choose to provide us with Personal Information when you communicate with us and use our Products and Services.</p>	<p><b>Example:</b> when you make Service requests or queries or when you opt-in to receive our marketing and promotional materials.</p>	<ul style="list-style-type: none"> <li>Contact details (name, postal address, email, phone number)</li> <li>Your Product and Service preferences</li> <li>Your TLC/Influx account information</li> <li>Your payment information</li> <li>Any other information you choose to give us</li> </ul>	<p>We collect and process this information based on our legitimate interest to provide Products and Services, to provide you with a high level of customer service, to market and promote our Products to you, enabling any rebates to be paid to you, billing you, and to fulfil our contractual obligations to you.</p>
<p><b>Information that is necessary for you to use our Products and Services</b></p> <p>We ask for and collect Personal Information when you use our Products and Services</p>	<p><b>Example:</b> when you use our electricity distribution system or use our meters.</p>	<ul style="list-style-type: none"> <li>Your Product and Service preferences</li> <li>Your account history</li> <li>Your energy consumption</li> <li>Any additional information we request and that you provide in connection with the operation of our business and performance of our Services to you</li> </ul>	<p>We collect and process this information based on our legitimate interest to respond to your requests or queries, to provide you with a high level of customer service, and to fulfil our contractual obligations to you. Without the information, we may not be able to provide you with the requested Services.</p>
<p><b>Information we automatically collect from your use of our Website</b></p> <p>When you use the Website, we automatically collect Personal Information about the Services you use and how you use them.</p>	<p><b>Example:</b> when you use certain features within our Website, when you visit or when you browse the content on our Website, when you accept our ‘Cookies’.</p>	<ul style="list-style-type: none"> <li>Your geo-location through your IP address or mobile device’s GPS</li> <li>Your user information (content, webpages, other actions performed on our Website)</li> <li>Your payment and transaction history</li> </ul>	<p>We collect and process this information based on our legitimate interest in ensuring a positive user experience, performance of our contract with you, to provide and improve the functionalities of our Website.</p>

Category		Types of personal information collected	Legal Basis for Processing
<p><b>Information we collect from third parties</b></p> <p>We may collect information that others provide about you when they use the Website or obtain information from other sources (including our third-party service providers) and combine that information we collect through our Website</p>	<p><b>Example:</b> when you link, connect or login to our Website from a third-party service (eg Google, Facebook, LinkedIn etc), and when other parties provide us with information, including data to help improve user experience such as your Retailer and to detect fraud and Website security issues.</p>	<ul style="list-style-type: none"> <li>• Your Product and Service preferences</li> <li>• Your profile information from third party Websites</li> <li>• Your user information from third party Websites</li> <li>• Other information from publicly available sources</li> </ul>	<p>We collect and process this information based on legitimate interest in ensuring a positive user experience, ensuring the security of our Website and the safety of our customers and, network planning and management and where necessary, to communicate with you.</p>

3.2 We may collect the following Personal Information:

- (a) Your name and contact details, your date of birth and limited medical information as required for those who are deemed Medically Dependent.
- (b) Your energy consumption and account history with us.
- (c) Information about your use of our Products or Services.
- (d) Information you provide to us when responding to our customer surveys.
- (e) Any other information you give us (including information provided on telephone calls which is monitored and recorded).

When you disclose your Personal Information to us it must be accurate, complete, up-to-date and not misleading. If you give us Personal Information about someone else, then you must be authorised to do so, and they should be made aware of this Privacy Policy.

4. **HOW TLC COLLECTS YOUR INFORMATION**

4.1 We collect Personal Information:

- (a) From you directly (like when you provide your details to us).
- (b) From you indirectly (like when you use our Services, visit our Website or interact with us on social media).
- (c) From third parties (like contractors and agents that we engage to perform Services on our behalf).
- (d) From places where the information is publicly available.

Any information that we collect from you or any third party will only be used for the purposes set out in this Privacy Policy.

## 5. **HOW TLC WILL USE AND DISCLOSE YOUR PERSONAL INFORMATION**

5.1 You authorise TLC to use and disclose your Personal Information for the following purposes:

- (a) To provide you with our Products or Services.
- (b) To respond to your queries regarding the Website, our Products or Services.
- (c) To administer your account with us.
- (d) To process your local energy trust rebate.
- (e) To deal with any of your request, enquiries or complaints.
- (f) To bill you and to collect money that you owe us.
- (g) To operate and maintain our network.
- (h) For our internal record keeping purposes.
- (i) To facilitate the sale or other disposition of our business or assets.
- (j) To comply with our legal, government and regulatory obligations.
- (k) For any other purposes that you give your consent to.

5.2 From time to time, TLC may disclose your Personal Information to third party service providers. You authorise us to disclose your Personal Information to:

- (a) Our subsidiary company, Influx Energy Data Limited to provide Metering Equipment Provider (MEP) services to TLC in connection with TLC's business operations.
- (b) Third parties that provide us with products and services that enable us to provide Products and Services to you.
- (c) Credit agencies.
- (d) Any other person as authorised by you.

In some cases, we may remove personal identifiers from your Personal Information and maintain it in an aggregate form. We may combine this information with other information that we hold to produce anonymous, aggregated statistical information, which is helpful to us in improving our Products and Services. Once your Personal Information is anonymised, it may no longer be capable of identifying, or being re-linked, to you.

## 6. **HOW WE SAFEGUARD YOUR PERSONAL INFORMATION OUTSIDE NEW ZEALAND**

6.1 From time to time, we may disclose, and you authorise us to disclose, your Personal Information to an overseas service provider for any of the above purposes. We make sure that the overseas service provider is:

- (a) a participant in a prescribed binding scheme for international disclosures of Personal Information; and/or
- (b) is located in a country that provides comparable safeguards to New Zealand's privacy laws, approved by the Privacy Commissioner.

If not, then we will take reasonable steps to ensure that the overseas service provider is required to protect your Personal Information in a way that, overall, provides comparable safeguards to those required under New Zealand's privacy laws. Examples of these steps include a written agreement between us and the overseas service provider or making reasonable enquiries regarding data protection standards of the country in which the overseas service provider is located.

6.2 If you are in a Member State of the European Union, your Personal Information may be transferred to or stored in a geographic region that imposes different privacy obligations than the country you are currently in. We will only transfer your Personal Information to a "secure third country", such as New Zealand, or to a third country or international organisation where appropriate safeguards are provided in accordance with the GDPR.

## 7. **COOKIES**

7.1 Cookies are small text files placed on your computer, mobile phone, tablet, or other electronic device to store data that can be recalled by a web server in the domain that placed the cookie. This data often consists of a string of numbers and letters that uniquely identifies your device, but it can contain other information as well. Some cookies are placed by third parties acting on our behalf. We may use cookies and similar technologies to store and honour your preferences and settings, enable you to sign-in, provide interest-based advertising, analyse how our Products or Service perform, and fulfil other business functions or operations set out in this Privacy Policy.

7.2 To enable some of the features and functionality on our Website, you may need to permit us to place cookies on your device. You can remove or block cookies by using the settings in your browser, but it may affect your ability to use our Website.

## 8. **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.

## 9. **HOW TLC PROTECTS YOUR PERSONAL INFORMATION**

TLC will use reasonable care to protect your Personal Information from unauthorised access, use, modification, disclosure, and loss. TLC will take reasonable steps to ensure that our third parties whom we disclose your Personal Information to also take reasonable steps to protect your Personal Information in accordance with this Privacy Policy and the law.

## 10. **REQUEST ACCESS TO YOUR PERSONAL INFORMATION**

You have the right to request access to Personal Information that TLC holds about you. If TLC does not give you access to the Personal Information that you have requested, then we will let you know

the legal reasons for not disclosing your Personal Information. If you are not happy with the legal reasons provided, then you have the right to complain to the New Zealand Privacy Commissioner: [www.privacy.org.nz/your-rights/how-to-complain/](http://www.privacy.org.nz/your-rights/how-to-complain/).

## 11. **REQUEST CORRECTION OF YOUR PERSONAL INFORMATION**

You have the right to request correction of the Personal Information that TLC holds about you. TLC will correct your Personal Information if it is necessary to ensure that your Personal Information is accurate, up to date, complete and not misleading. If we decide that it is unnecessary to correct your Personal Information, we will let you know the legal reasons for its decision. If you are not happy with those reasons, then you have the right to complain to the New Zealand Privacy Commissioner: [www.privacy.org.nz/your-rights/how-to-complain/](http://www.privacy.org.nz/your-rights/how-to-complain/).

## 12. **PRIVACY COMPLAINTS**

If you think that your privacy rights have been breached, You can make a written complaint to our Privacy Officer by email [privacy@thelines.co.nz](mailto:privacy@thelines.co.nz) or otherwise contact the NZ Privacy Commissioner at <https://www.privacy.org.nz/your-rights/making-a-complaint/complaint-form/>.

## 13. **GDPR**

13.1 If you are in a Member State of the European Union, you have the following rights with respect to your Personal Information:

- (a) Lodging complaints: You have the right to lodge a complaint with a ‘supervisory authority’ established by a Member State under Article 51 of the GDPR.
- (b) Right of rectification: You have the right to obtain from TLC without undue delay the rectification of inaccurate Personal Information. We may seek to verify the accuracy of the Personal Information before correcting it.
- (c) Right to restrict processing: You have the right to limit the ways in which we use your Personal Information, in particular where:
  - (i) you contest the accuracy of your Personal Information;
  - (ii) the processing is unlawful, and you oppose the erasure of your Personal Information;
  - (iii) we no longer need your Personal Information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or
  - (iv) you have objected to the processing of your Personal Information and pending the verification of whether the legitimate grounds of TLC override your own by a supervisory authority.
- (d) Right of access and portability: You have the right to request certain copies of your Personal Information held by us. You may also be entitled to request copies of Personal Information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider nominated by you (where technically feasible).

(e) Right to be forgotten: You have the right to obtain from TLC the erasure of your Personal Information without undue delay where one of the grounds set out in Article 17(1) of the GDPR apply. Please note that:

- (i) we may retain some of your Personal Information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety;
- (ii) we may retain and use your Personal Information to the extent necessary to comply with our legal obligations. For example, we may keep some of your information for tax, legal reporting, auditing and regulatory compliance obligations; and
- (iii) because we maintain our Website and Products to protect from accidental or malicious loss and destruction, residual copies of your Personal Information may not be able to be removed from our backup systems.

#### 14. **PRIVACY POLICY CHANGES**

14.1 TLC may from time to time change our Privacy Policy. These changes may reflect, among other things, changes in laws, our data collection practices, and/or changes to our business, Services or Products. We will post any updated policies on our Website. The updated Privacy Policy will take effect 14 days after the date it is posted.

14.2 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.

14.3 Signing up to our website, services or agreeing to interact with us means you agree with our Privacy Policy.

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

### **Relevant Legislation and Compliance (if applicable)**

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- The New Zealand Privacy Act 2020

### **Related Policies and Procedures (if applicable)**

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- Media and Social Media Policy
- Sponsorship Policy

### **Controlled Document Review Details**

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<b>Person Responsible for Document:</b>	Simon Batters, GM – People & Safety
<b>Document Approved by:</b>	
<b>Approval Date:</b>	16 June 2023
<b>Review Cycle:</b>	Two yearly
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