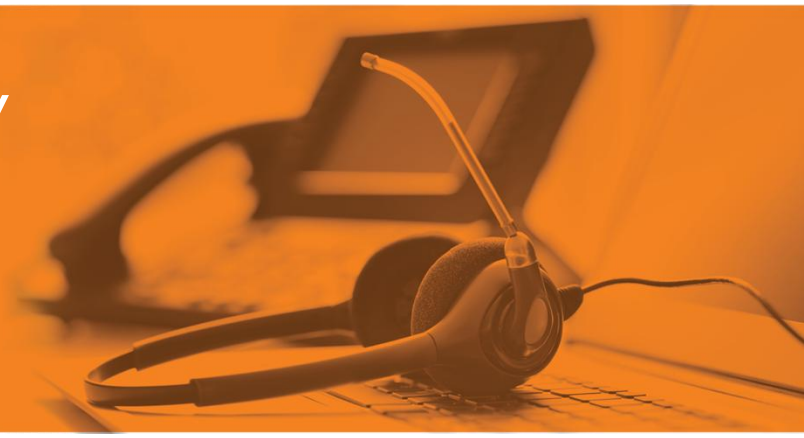
Privacy Policy

Think Concepts Ltd.



About this Policy

Think Concepts cares about your privacy. The manner in which we handle your personal information is governed by the Privacy Act 2020 (Privacy Act) and the Information Privacy Principles under the Privacy Act.

This policy is designed to help you to understand what this means in relation to the rights that you have in respect of your personal information. For context, 'personal information' in relation to the Privacy Act and this policy means is information about an identifiable individual (a living person).

This policy sets out how Think Concepts collects, uses, discloses and protects your personal information. (Note that this policy does not limit or exclude any of your rights under the Privacy Act. For further information see the Office of the Privacy Commissioner: www.privacy.org.nz.).

When does this Policy apply?

This Policy describes how we maintain your privacy when handling your personal information.

This Policy applies if:

- you're one of our clients;
- you use any of our services (including any of the products we may supply in connection with those services); or
- you visit our website (www.thinking.co.nz) (our Sites) or any of our social media channels.

By providing personal information to us, you authorise us to collect, hold, use and disclose that information in accordance with, and for the purposes specified by, this Policy.

What personal information do we collect?

We may collect the following types of personal information about you:

- your name, address, and contact details (such as email address and telephone number/s);
- your age, gender, industry or profession, role and place of work;
- records of our communications with you, including any Q & A and or course any complaints

(and how we handle them);
- your payment information, such as your credit card or direct debit information;
- details of the services (and any associated products) we have provided to you, or that you've enquired about, including any additional information necessary to deliver those services (and products) and responses to your questions;
- when you access our website or social media channels – details of your device (including its ID, type, geo-location information, computer and connection information, statistics on page views, clicks and interactions, traffic to and from our services and/or products and our website and social media channels, and IP address; and
- other personal information that it may be necessary to gather in order to facilitate your dealings with us.

How do we collect your personal information

In keeping with the description under the previous heading, we may collect personal information about you from:

- directly from you, when you provide that personal information to us, including through our website and by using our services, through any registration or subscription process, through your contact with us (e.g. via email or telephone calls), or when you buy or use our services (and any products);
- through third parties where you have authorised the third party to facilitate this, or sometimes where the information is publicly available;
- by use our website or social media channels;
- through interaction with us – such as through our sales function or client support team;
- by completing an online form, such as registering for any training or bulletins we may provide;
- through interacting with any of our channel partners;
- by completing one of our surveys or service delivery testimonials; or
- through other forms of interaction with us such as virtual attendance at events we may run.

Where possible, we will usually collect personal information directly from you. However, because of the impact of third parties, we may also collect personal information about you:

- directly from our third-party providers;
- indirectly, from publicly available information, such as that available via social media;
- through tools that measure and track how your use of our services (and products) or our website and/or social media channels; and
- from third parties that provide us with marketing leads.

How do we use your personal information

Generally, we use, and expect to use, your personal information:

- to provide our services (and any associated products) to you;
- to market our services (and products) to you, including contacting you – which will be electronic (such as via email, text messages, etc.);
- to improve the services that we provide to you
- to respond to communications from you, including Q &A and even complaints;
- to conduct research and analysis (which will be on an anonymised basis);
- to protect and/or enforce our rights and interests, including defending any claims brought

against us; and
- for any other purpose authorised by you or the Privacy Act.

Disclosure of your personal information

We will only use or disclose your personal information:

- for the purpose for which it was collected (or a purpose that is directly related to the purpose for which the information was collected);
- for any other purpose that you have authorised; and
- in other cases where we are permitted (or required) to do so by law.

To be clear, we will not sell your personal information to third parties without your express consent.

We may disclose your personal information to third-party service providers who help us to deliver our services (and any products) to you. These third-party providers are used to deliver a variety of client services, including archiving, banking, advertising and marketing, data and business analysis and other technology services. Each of these third-party providers are chosen by us after an informed selection process that seeks, amongst other things, to ensure that your personal information is only used to the extent necessary for them to provide their services to us and/or you.

Some of our third-party providers, to whom we disclose personal information may be located overseas, including in Australia and further afield and may not be subject to New Zealand law (including the Privacy Act). Despite this, we will employ industry-standard measures, and those which are reasonable in the circumstances, to ensure that these third parties are either subject to privacy laws that, when taken overall, provide safeguards which are comparable with those under the Privacy Act, or are otherwise required to protect the information in a way that, when taken overall, provides safeguards which are comparable with those under the Privacy Act. For completeness, unless you have authorised us to do so, we will not disclose your personal information to an organisation that may not be required to protect your personal information by means of safeguards which are comparable to those under the Privacy Act.

What we do to protect your personal information

The safety and security of your personal information is key to our business. We seek to reflect the trust that you have placed in us, by sharing your personal information, with our commitment to protecting it.

We are virtually a paperless workplace. Therefore, when you share your personal information with us, we will store it electronically. In doing so, we take all reasonable steps to protect your personal information from loss, unauthorised use, access or disclosure in line with industry standards. This includes having good policies and procedures in place – as well as technological safeguards, such as the use of up-to-date encryption tools.

For example, before you enter any of your personal information through our website, you can check that the relevant page is encrypted by:

- confirming that page address in the web browser's toolbar or status bar – it should begin with https://; or
- checking that the status of padlock icon in the web browser's toolbar or status bar – it should be locked.

To the extent that we hold any of your personal information offline – we are committed to

protecting that too. As a result, our policies and procedures for accessing information for the purposes of our business, include access controls.

Information security is a two-way street. As noted above, we take industry standard measures to protect your personal information after we receive it – but we cannot guarantee the safety and security of the pathways that you use. For example, if you are using our services, our website or our social media channels, we ask you to check that you do so from a secure pathway. And, if you use email to send or receive your personal information, you should be aware that the information may be less than secure when it is being transmitted.

Also, if you follow a link on our website to another website, then the access to and use of that website will be subject to the privacy and other policies of the owner of that website governing access to and use of your personal information.

Accessing your personal information (and making corrections)

You have the right to access your personal information (to the extent that it is readily retrievable) when we hold it. And you have the right to request corrections to your personal information when we hold it. Before exercising those rights, we will need to ask you to verify that you have the right individual – and that it is your personal information that is affected.

For requests for correction, where the correction is reasonable and we are reasonably able to make the requested change, we will do so. If we do not make the correction, we will take reasonable steps to note that you have requested the correction.

To exercise these rights, please contact us by email: info@thinking.co.nz. Any such request should provide evidence to enable us to verify that you are who you are (and if not – then we will request it) and set out the details of your request (e.g. the nature of the personal information you seek to access or the correction that you are requesting).

We must also reserve the right to charge you for our reasonable costs of providing copies of your personal information to you or making the requested correction to that information.

Changes to this Policy

We may make changes to this policy from time to time. Any such change will apply from the date that the revised version of this Policy is uploaded to our website.