PRIVACY POLICY

Introduction

This privacy policy applies to Safe Kids in Daily Supervision Ltd (sKids) NZBN 9429031604291 and any entity owned or controlled by Safe Kids in Daily Supervision Ltd. ("Related Entity") in operations in New Zealand.

At skids, we are committed to protecting the privacy of the personal information we collect about any person and to ensuring our compliance with the New Zealand Privacy Act 2020 (the "NZ Privacy Act"). This privacy statement describes why and how we collect and use personal data and provides information on individuals' rights.

In-order to conduct normal business operations, sKids will collect personal information in-order to provide our services safely and effectively, to operate our business, to hire, train and manage our staff and in the recruitment of Franchisees.

Notwithstanding the means of collection, processing, use, disclosure and retention periods for each purpose, this policy forms the overarching policy and guidelines of personal information collected.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

Exclusions

This policy relates to sKids collection and handling of personal information that is covered by the NZ Privacy Act. It is not intended to cover categories of personal information that are not covered by the NZ Privacy Act unless otherwise specified.

Nature of Information collected:

sKids will collect, store and use personal information from customers, suppliers, employees, franchisees, contractors and other individuals (see further details on this below). We collect and hold this information when it is necessary for business purposes.

Typically, this information includes, as appropriate:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth, gender, marital status, and dependants.
- Next of kin and emergency contact information.
- Personal information about children on our programmes such as name, addresses, date of birth, gender, hobbies, and interests.
- Employment History details
- Financial information as deemed necessary to fulfil contractual service provision.
- Photographic proof of identity.

Sensitive Information:

sKids may also collect, store, and use the following sensitive personal information that is deemed as "Special categories":

- Information about a child's race or ethnicity.
- Information about a child's physical and mental health, including any medical conditions, health and sickness records, and details of primary healthcare provider.

- Information relating to a prospective employee's criminal history
- Information relating to a child's custodial situation, including any court orders or enforcements.

sKids collects this information, in-order to fulfil our legal responsibilities as a childcare provider, and in-order to provide our contractual services to the customer.

Collection of Personal information:

Information sKids collects directly

sKids will collect most information directly from the individual, and by dealing with sKids you agree that we may collect, store, use and disclose your personal information for the purposes and in the manner outlined in this privacy policy. Information is collected via forms completed by the individual, face-to-face meetings, email messages, telephone conversations or digital forms via our website or Child Care Management system (programme bookings system).

Information sKids collects indirectly

Sometimes, sKids will need to collect personal information about individuals from a third party. We only do this where we are permitted to do so by applicable law. The kinds of information we may collect, where we get this information from and why we need this are summarised below.

Depending on the circumstances and nature of your relationship with sKids, we may collect, store, use, disclose and retain the following types of information about you, which we collect from third parties:

Who provides sKids with the information	Information collected	Why sKids needs this information
Parents or legal guardians of the child enrolling or enrolled in sKids programmes.	• General information about the child, such as the child's name, address, date of birth, gender, hobbies, interests. • Sensitive information about the child (as further described in the section above). • Any additional information that you share with us about the child. • Information you provide us about the individual acting as your next of kin or emergency contact.	For enrolment purposes, to provide our services to you and your child safely and effectively and to fulfill our legal responsibilities as a childcare provider.
If you are a candidate for employment with sKids, third party services that assist with CV/reference checks, and background screening services, including those provided by the Ministry of	Criminal record checks, reference checks, and other pre-employment screening material to confirm statements made to us during recruitment. .	To assess your suitability for employment.

Justice and the NZ Police..		
Referees (provided by you when you apply for a job at sKids)	Information about you that the referee discloses to us.	To assess your suitability for employment.
sKids' employees	Information that the employee discloses to us about you as the employee's emergency contact.	To administer and manage the employment relationship between us and the employee.
sKids' franchisees	Information that the franchisee discloses to us about you as the parent or legal guardian, and/or about the child enrolling or enrolled in sKids programmes, including your enrollment details, critical information (such as medical conditions) next of kin data and information about your billing and payment.	For enrolment, administrative, financial management and group-management purposes, to provide our (and our franchisees') services to you and your child safely and effectively and to fulfill our legal responsibilities as a franchisor and childcare provider.

How sKids use the Personal information:

sKids will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- To perform our obligations under a contractual relationship with you; or
- To comply with a legal obligation; or
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, such as reviewing the quality of the services we provide to you.

Specifically, sKids may also use your personal information in the following situations:

- Where we need to protect your interests (or someone else's interests),
- When providing our services to you,
- Where it is needed in the public interest or for official purposes, and as directed by current legislation,
- Where we are required to make investigative enquiries,
- When dealing with requests, enquiries or complaints and other customer care related activities,
- To assess our capability to provide our services,
- To Review and improve our services, standards, and procedures,
- To ensure the safety and welfare of the children in our care,
- To determine performance requirements,
- For education, training, and development requirements,

- To comply with current health and safety obligations,
- For business management and planning, including audit purposes,
- In connection with monitoring, testing and maintenance of computer and other IT systems and networks,
- For general administrative and business purposes,
- In connection with the transfer of any part of our business involving you as a customer, employee, supplier, contractor or franchisee (as the case may be)

Disclosure of Personal Information

sKids will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you, or where we have another legitimate reason in doing so (including for any of those purposes outlined above). Some of your information may be shared with:

- Relevant members of our staff, who need to know this information in-order to provide our services. In this case, only directly relevant information will be shared with certain staff members as appropriate for them to fulfil their obligations to the individual and to sKids.
- Third parties who deliver our services to you (who may use and disclose your personal information for the same purposes as us), e.g. franchisees, contractors, payment service providers, and system hosting services.
- Professional advisers, for example, law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business. Personal data may be shared with these advisers as necessary in connection with the services they have been engaged to provide.
- Parties and agencies involved in data protection and/or crime prevention, detection, investigation and/or prosecution.
- Other parties, when explicitly requested by you in writing.
- **Other parties** (for example, schools and government agencies) in accordance with our legal obligations under the Vulnerable Children's Act 2014, or other relevant legislation. As part of our duty of care, we may need to share information to support the safety and wellbeing of the child. .

We may also share non-personal, de-identified and aggregated information for research or promotional purposes. Except as set out in this policy, we do not sell to or trade personal information with third parties.

Retention of Personal information and Data.

Personal information collected by sKids may be stored via paper-based forms or electronically.

All paper-based documents are held in secure filing systems at the programme location or, at sKids Head Office as appropriate and are directly accessible only by a small number of key personnel who have the appropriate authorisation to access the documents.

Electronic storage of personal data is retained in secure, password protected and where necessary, encrypted software platforms and products. This is accessible by key personnel who require access explicitly for the purpose to perform their roles in relation to providing skids services.

sKids retain personal information and data processed for as long as is required for the purpose for which it was collected, and in accordance with the current legislative requirements.

In some instances, personal information may be held for longer periods where extended retention periods are required by law or regulation and as necessary in-order to defend our legal rights.

At the conclusion of the retention period, individual's information will be destroyed via the following methods:

- Paper based, via a confidential and secure destruction service,
- Electronically held data – will be deleted or anonymised as applicable and all third parties will be notified to do the same as appropriate.

Storage of information in cloud systems. sKids may store personal information within services provided by offshore cloud service providers (CSP's).
sKids will make every endeavour to ensure that all CSP providers meet the NZ Privacy Act requirements and all other New Zealand Legislative requirements that sKids is obliged to adhere to.

Transfer of Information outside of NZ
Occasionally, and for legitimate legal and/or business reasons (including for those purposes described in this privacy policy), it may be necessary to share personal information with relevant staff within our parent company based in Australia. This will be done with adherence to the "General Data protection Regulation (GDPR) – International Transfers". Our parent company in Australia is subject to the Australian Privacy Act which we understand, overall, provides for comparable safeguards to those safeguards provided under the NZ Privacy Act.

Privacy on our Web Sites and Applications
This policy also applies to any personal information we collect via our websites and any skids applications, including mobile applications. For further information specific to the use of sKids websites and other applications, please refer to sKids Digital privacy policy located at the bottom of each webpage.

Right to Access & Correction of Personal Information
sKids will provide access to personal information upon request by an individual (or their authorised representative) once identity has been satisfactorily confirmed, except in limited circumstances where it is permitted under the New Zealand Privacy Act for us to withhold this information (for example, for any of the reasons specified in sections 49–53 of the Privacy Act).

If, upon accessing your personal information, you believe that any part of it is incorrect, incomplete, or misleading, you have the right to request the correction.

You may also provide us with a Statement of Correction for us to attach to the relevant information we hold about you. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

To enquire about, access, or request correction of your personal information, please contact the sKids Privacy Officer at:privacy@skids.co.nz

Corrections and Concerns
If we provide you access to personal information that we hold about you, then you may also,

- **Request a correction** of the personal information that we hold about you. This enables you (and assists us to ensure) that the personal information we hold about you is always accurate, current, complete and not misleading. If we inform you that we will not make the correction

sought, then you have the right to make a complaint to the Office of the Privacy Commissioner in respect of that refusal.

- **Provide us with a Statement of Correction** for us to attach to the personal information we hold about you, if we do not correct the personal information you have requested us to.

If you would like to exercise any of the above rights, please contact the sKids Privacy Officer at privacy@skids.co.nz

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Right to Complain

If sKids become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you consider you have cause for complaint, please contact our Privacy Officer. If you are not satisfied with our handling of your concern, you may make a complaint to the Office of the Privacy Commissioner: https://privacy.org.nz/your-rights/making-a-complaint/

Privacy Breach

If we become aware of a privacy breach, we will take the following actions:

1) Take all reasonable steps to immediately contain the breach, utilising contracted 3rd parties specialising in privacy/data breaches and/or key personnel with the appropriate expertise (including for example our appointed Privacy Officer).
2) Assess the seriousness, the cause, the extent, and the possible harm resulting from the breach.
3) If we reasonably believe that the privacy breach has caused or is likely to cause serious harm to affected parties (after taking into account any mandatory considerations imposed by the NZ Privacy Act), we will notify the affected parties, the Privacy Commissioner and any third party required for notification and/or follow up (for instance, skids Insurers, governmental agency(ies) and other agencies connected with data protection or crime detection, investigation, prevention or prosecution) as soon as practicable after becoming aware of that notifiable privacy breach (unless we are not required to do so pursuant to any permitted exception specified under the NZ Privacy Act).
4) Review our processes and update our policies and prevention plans, as necessary.

Contact us

Contact: Privacy Officer (Financial Controller)
Address: 62A Diana Drive, Glenfield, Auckland
Email: privacy@skids.co.nz
Phone: 0800 274 172