	Policy	D6.7.1 Customer Privacy Policy (Website)		
	Top Energy <input checked="" type="checkbox"/>		Ngawha <input checked="" type="checkbox"/>	

Top Energy Limited and its related entities (we, our, us) are committed to protecting our customers’ personal information. We have created this privacy policy to help you understand how we collect, use and protect your information when you visit our websites and use our products and services.

This privacy policy covers the following topics:

1. What information do we collect?
2. How do we use your information?
3. Sharing your information
4. Protecting your information
5. Accessing and updating your information
6. Internet use
7. Destruction of your information
8. Changes to our Privacy Statement
9. This Statement is provided for your information and doesn’t limit or exclude your rights under the Privacy Act 2020.

What information does Top Energy collect?


We collect information relating to you that you have provided to us (for example, on a services application or registration form, through the way you use our products and services, when you enter a competition or promotion, or that we may have obtained from another source (such as from our field service providers and contractors)).

The information may include your name, address, telephone number(s), information on how you use our products and services, and anything we need to provide these products or services to you. We may also monitor and record your calls to us and our calls to you.

We collect personal information about you when:

- It is necessary to provide goods or services you have requested;
- You have expressly consented to us collecting that information, for example when you apply for an account with us, or enter a competition or promotion run by us;
- It is necessary to protect or enforce our legal rights or interests (including to protect our IT systems or to improve cyber security), or to defend any claims made against us by any person (including you); or,
- It is required by law;

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- Where possible, we will collect the information directly from you. However, the method of collecting this information may vary depending on which one of our services you are using (for example our contractors can collect information on our behalf when fixing faults).
- We also use CCTV cameras to record footage at some of our sites. This footage may constitute 'personal information' as defined in the Privacy Act.

How does Top Energy use your information?

The information that we collect from you may be used by us for a number of purposes connected with our business such as:


- Supplying you with products and services;
- Processing your orders or applications and administering your account;
- Enabling an organisation to pay a benefit to a customer (e.g. a Top Energy discount);
- Billing you (unless you pay by another agreed method) and collecting any debt owed to us by you;
- Dealing with your requests, enquiries or complaints and other customer care related activities;
- Informing you about special offers or promotions that are relevant to your relationship with us;
- Carrying out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;
- Carrying out activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or a potential customer; or,
- For general administrative and business purposes;
- CCTV footage specifically may be used for the following purposes:
 - Detecting and deterring undesirable activity on our sites; and,
 - Monitoring the safety and security of our staff and our sites and completing incident investigations.

Sharing your information

There may be times when we need to disclose your personal information to third parties. You authorise us to disclose your information to:

- Our Group companies who may use and disclose your information for the same purposes as us;
- Those who provide us or our Group companies with products or services that support the services that we provide, such as (but not limited to) our suppliers, field service providers and contractors;
- Credit reference agencies (unless we have agreed otherwise), who may share your information with other organisations and who may keep a record of the searches we make against your name;
- If someone else pays your bill, such as your landlord, that person;
- Anyone we transfer our business to in respect of which you are a customer or a potential customer;

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- Anyone who hosts or maintains data centres, service platforms, cloud-based solutions and other infrastructure and systems on behalf of us and our Group companies, where your information is processed, hosted or stored; or,
- Any person or organisation as authorised by the Privacy Act 2020.

Otherwise, we will only disclose your personal information without your consent if doing so is:

- Necessary to protect or enforce our legal rights or interests, or to defend any claims made against us by any person (including you);
- Necessary in order to report a cyber incident or for cyber security purposes (including to prevent unauthorised access to, or attacks on, our systems);
- Necessary to lessen a serious threat to a person’s health or safety; or,
- Required by law.

Protecting your personal information

We will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up to date and stored in a secure environment protected from unauthorised access, modification or disclosure.

CCTV footage will usually be retained for a period of 30 days, after which time it will be deleted.

In the event of a breach

We are aware of our obligations under the Privacy Act 2020 and the mandatory reporting requirements in the event of a breach of personal information that will or is likely to cause serious harm.

We have a documented Privacy Breach Response Plan that outlines the process that will be followed, including the notification of affected individuals and the Privacy Commissioner.

Accessing and updating your personal information


You may request access to the personal information we hold about you by sending an email to privacy@topenergy.co.nz. Please quote your name and address. We would be grateful if you could also provide brief details of what information you want a copy of (this helps us to more readily locate your data).

In some cases, there may be a charge associated with providing copies of your personal information to you. If so, we will advise you of this prior to sending your information to you.

We will not be able to provide your personal information if we do not know or don’t have reasonable grounds to believe it is personal information about you or if disclosing the information would involve the unwarranted disclosure of the affairs of another individual.

You can request correction or amendment of the information held by us at any time and as often as necessary by sending us an email to privacy@topenergy.co.nz and specifying the information that you require changed. If it is reasonable in the circumstances for us to do so, we will make the requested change or correction,

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otherwise we'll take reasonable steps to mark that information as having been subject to a change or correction request.

We will never ask you for your password in an unsolicited phone call or in an unsolicited email. Also, if you are using the internet, remember to sign out of your account and close your browser window when you have finished. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place.

Internet use

We make every effort to maintain the security of our internet connections; however, for reasons outside of our control, security risks may still arise. Any personal information transmitted to us or from our online products or services will therefore be at your own risk, however we will use our best efforts to ensure that any such information remains secure.

We may use cookies and other interactive techniques such as web beacons to collect information about how you interact with our website, and web-related products and services, to:

- Understand what you like and use about our website;
- Understand what you do not like and do not use on our website;
- Provide a more enjoyable, customised service and experience;
- Enable you to use certain services on our website; and,
- Help us develop and deliver better products and services tailored to our customers' interests and needs.

We also collect IP addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. We collect and manage IP addresses as part of the service of providing internet session management and for security purposes.


We may use a persistent cookie to record details such as a unique user identity and general registration details on your PC. This helps us recognise you on subsequent visits to this website so that you don't have to re-enter your registration details each time you visit us and allows us to carry out the activities mentioned above.

Most browser technology (such as Internet Explorer, Chrome etc) allows you to choose whether to accept cookies or not – you can either refuse all cookies or you can set your browser to alert you each time that a website tries to set a cookie. You do not need to have cookies turned on to access our sites, but you may need them for customisable areas of the site that we may develop in the future, or to access and benefit from certain functionality offered by the site.

Destruction of your information

We take all reasonable steps to ensure your personal information is appropriately disposed of once it is no longer needed for the purpose for which it was collected.

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Changes to our privacy policy

We may change this privacy policy from time to time and we will tell you about a change in the policy by posting an updated policy on our website. Any change we make applies from the date we post it on the website.

Policy Implementation

		Competence and Interface
Implementation of the Policy	G	Board of Directors
	A	Chief Executive Officer
	R	General Manager Finance
	R	General Manager Generation
	R	General Manager Network
	R	General Manager Contracting
	R	Chief Information Officer

Legend: **G** – Governance; **A** - Accountability; **R** - Responsibility; **C** - Co-operation.

References

The following references should be considered in support of this Policy:

Ref. Number	Name
<i>D6.7</i>	<i>Privacy Policy</i>

The following procedural arrangements are implemented in support of this Policy:

Ref. Number	Name
	<i>N/A</i>