



Advocate Communications Ltd PRIVACY STATEMENT

Advocate Communications Ltd is a New Zealand registered company incorporated on 2nd September 2008. We are owners and publishers of the Advocate South, Summer in the South and The Southland App.

Contact Details

Our offices are located at:

70D Town Centre, Te Anau 9600

87 Spey Street, Invercargill 9810

Phone: +64 3 249 9070 Fax: +64 3 249 9060

Phone: +64 3 218 8001

Our postal address is:

P O Box 251, Te Anau 9640

Our email address is:

info@advocatesouth.co.nz

The registered office for the company Advocate Communications Ltd is:

Crowe Horwath (NZ) Limited, 112 Town Centre, Te Anau, 9600, New Zealand

The Southland App website can be found at: <https://www.thesouthlandapp.co.nz/>

The Advocate South website can be found at: <https://www.thesouthlandapp.co.nz/advocatesouth>

The Advocate South newspaper can be read online at: <http://advocatesouth.realviewdigital.com/>

Summer in the South magazine can be read online at: <http://advocatesummer.realviewdigital.com>

PRIVACY STATEMENT

The Southland App is owned and operated by Advocate Communications Limited. In this policy, "us", "we" or "our" means Advocate Communications Limited and its related bodies corporate.

This policy addresses the following:

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We are bound by the New Zealand Privacy Principles contained in the Privacy Act 1993 (Act) (subject to exemptions that apply to us under that Act) 1993. From time to time, due to the nature of our business activities, we will handle personal information relying on the media exemption in the Act where appropriate. Where we do so, we will ensure that we comply with the New Zealand Press Council Privacy Principles. If you require more information on the collection and use of personal information in the course of journalism, please visit the Privacy Commissioner Website at <http://privacy.org.nz/>

We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most

recently updated policy. Your privacy matters to us, so whether you are new to the Southland App or are a long time user, please take the time to get to know our practices.

WHAT IS CONSIDERED PERSONAL INFORMATION?

When used in this policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses). If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect the following types of personal information:

name;
mailing or street address;
email address;
telephone number;
age or birth date;
profession, occupation or job title;
details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
any additional information relating to you that you provide to us directly through our App, websites or indirectly through use of our App, website or online presence through our representatives or otherwise; and
information you provide to us through our App, office, customer surveys or visits by our representatives from time to time.

COOKIES

In some cases we may also collect your personal information through the use of cookies. When you access our App, we may send a "cookie" (which is a small summary file containing a unique ID number) to your mobile device. This enables us to recognise your mobile device and greet you each time you visit our App, without bothering you with a request to register or login. It also helps us keep track of products or services you view, so that we can send you news about those products or services.

We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our App products and services.

If you do not wish to receive cookies, you can set your device so that your device does not accept them. We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the New Zealand Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

HOW DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

We collect your personal information directly from you unless it is unreasonable or impractical to do so.

We do this in ways including:

through your access and use of our app, website or sending SMS/MMS or emails to us;
through someone else who has provided us with your information (e.g. entry into a competition);
during conversations between you and our representatives; and
when you complete an application or purchase order.

We may also collect personal information from third parties including:

third party companies such as credit reporting agencies, law enforcement agencies and other government entities;
advertisers;
mailing lists;
recruitment agencies;

contractors and business partners.

WHY DO WE COLLECT PERSONAL INFORMATION?

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide the best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

to provide products and services to you;
to provide you with news, information or advice about our existing and new products and services;
to communicate with you including by email, mail or telephone;
to manage and enhance our products and services;
to personalise and customise your experience;
to provide you with access to protected areas of our App;
to conduct competitions or promotions on behalf of Southland App and/or Advocate South and selected third parties;
to verify your identity;
to provide as part of business data to third parties if you have authorised us to do so;
to conduct business processing functions for operation of our websites or our business;
for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;
to provide your updated personal information to us, our contractors or external service providers;
to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
as required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION?

If you do not provide us with the personal information described in this policy, some or all of the following may happen:

we may not be able to provide you with the products or services you requested, either to the same standard, or at all (for example, if you do not register as a member of an App or website, you will not be able to access features or services that are reserved for members only);
we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or
we may be unable to tailor the content of our website, app or newspaper products to your preferences and your experience of our websites may not be as enjoyable or useful.

HOW DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose your personal information to:

our employees, related bodies corporate, contractors or external service providers for the operation of our websites, app or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, mailing houses, newsagents, couriers, payment processors, photographic analysers, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;
our existing or potential agents, business partners or joint venture entities or partners;
our sponsors, or promoters of any competition that we conduct or promote via our services;
specific third parties authorised by you to receive information held by us;
the police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;
as required or permitted by any law (including the Privacy Act).

HOW CAN I ACCESS AND CORRECT MY PERSONAL INFORMATION?

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it. Members of our websites will generally be able to access and update their membership details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

HOW DO I COMPLAIN ABOUT A BREACH OF PRIVACY?

If you believe your privacy has been breached by us, or have any questions or concerns about our Privacy Policy, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with privacy breaches. Once the Privacy Officer receives a complaint, whether it is in writing or by verbal means, the Privacy Officer will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavour to determine the nature of the breach and how it occurred.

We may contact you during the process to seek any further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:
Kirsty Pickett
Advocate Communications Limited
Post: P O Box 251, Te Anau 9640
Email: privacy@thesouthlandapp.co.nz

WILL MY PERSONAL INFORMATION BE DISCLOSED OUTSIDE NEW ZEALAND?

We may disclose personal information to our related bodies corporate and external service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of New Zealand, including the following:

our data hosting and Cloud-based IT service providers;

other external service providers located in the Philippines, India, Australia and United States; and

other third parties operating in jurisdictions including China, India, Indonesia, New Zealand, Hong Kong and the United States where you have authorised us to do so.

SECURITY

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

LINKS

Our App may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

CHANGES TO OUR PRIVACY POLICY

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. This privacy policy was last updated on **1st April 2019**.