



Privacy Policy

Our privacy commitment

We are committed to being open and transparent about how we manage your personal information.

Our Privacy Policy aims to communicate, in the clearest way possible, how we treat your personal information. We encourage you to read this Privacy Policy carefully. It will help you make informed decisions about sharing your personal information with us.

At First Security we have a few fundamental principles:

- We will **always** collect, store, use and disclose personal information in accordance with all applicable privacy laws. However, we have also put in place this Privacy Policy to protect personal information you submit or we collect.
- We will **only** use your personal information when it is necessary for us to deliver you our services or perform other necessary business functions and activities.
- We will **not** use or disclose your personal information for purposes unrelated to our business activities and the services we provide, unless we first obtain your consent.

Our Privacy Policy

This Privacy Policy sets out how we comply with our privacy obligations, including under the Privacy Act 2020.

We are bound by the requirements of the Privacy Act, which regulate how we may collect, store, use and disclose your personal information. The Privacy Act also specifies other requirements, such as how individuals may access, correct and delete information held about them.

When we say **personal information** we mean identifiable information about you, such as your name, email, address, telephone number, bank and credit card details, vehicle number plate, location data, photographic, audio or video footage of you and so on. Personal information can also include information that can be used, or that combined with other information we hold about you, to identify you in context.

In this Privacy Policy **we, us** and **our** and **First Security** collectively refers to First Security Guard Services Limited and its related companies and affiliates.

Your consent

First Security is a leader in providing security services to New Zealand, through our security personnel, surveillance and monitoring capabilities and technology solutions (**Services**). Our business relies on the collection of personal information that is submitted by you, or with your authority, to enable us to provide the Services.

By using our Services or providing your personal information to us, you consent to our collection, storage, use and disclosure of your personal information in accordance with this Privacy Policy.

How we collect your personal information

First Security Guard Services Limited (**First Security**) collects personal information about individuals as part of the course of our business.

It is our usual practice to collect personal information directly from you. For example, First Security may collect personal information when:

- You (or an organisation you are associated with) open an account with us
- You (or an organisation you are associated with) enter into an agreement with us to provide or receive a service
- We provide services to you - some of our services utilise technology like cameras and geo-tracking tools that gather your personal information such as photographic, audio and video footage of your image and details of your location
- You are a customer of or you visit a location operated by one of our clients and in the course of this your personal information is collected for example, through body worn cameras or closed circuit televisions (CCTV)
- You deal with us over the telephone, sends us a letter or an email
- You visit our website or you use or submit information to us through one of our mobile device applications or platforms
- when you visit us in person

The type of personal information we collect may include (but is not exclusive to) your name, address, telephone numbers, bank and credit card details, email address, vehicle number plate, photographic, audio or video footage and location data.

There may be occasions when we source personal information about you from a third party authorised to share your personal information (for example, a NZ government agency or a credit reporting agency) as well as publicly available sources such as internet search engines or social networking services.

We may collect personal information about you automatically when you visit our websites or use our Services, like your IP address and device type. Some of this information may be collected using cookies and similar tracking technologies.

First Security may also automatically collect non personal information through the standard operation of its information systems infrastructure.

You can choose not to provide your personal information to us, but it may mean that we are unable to provide our Services to you.

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

How we use and disclose personal information

We only use or disclose your personal information for the purposes for which you authorise us to, for related business purposes and activities, and where required by law. The primary purpose of collecting your personal information is to provide you with our Services and any related services you may request. In doing so, First Security may use the personal information we have collected from you for purposes related to our business including to:

- Verify your identity
- Communicate with you
- Complete a credit check
- Administer the products and Services we provide
- Conduct payment processing
- Notify you of our new or changed products or Services
- Carry out marketing or training in connection with our products and Services

Names and addresses of our customers may be provided to a mailing house to mail account statements to each customer or to distribute informative material. We may also use or disclose anonymised personal information for other purposes such as helping us to identify products and services that may interest you.

Except as required by law or expressly authorised by you or under this Privacy Policy, First Security will not give out your personal information to any third party.

Keeping Information up to date

It is your responsibility to ensure that the personal information you provide is accurate, complete and up-to-date. If you learn that the current personal information we hold about you is inaccurate and you wish to update this information, you should contact us at fsg.billing@firstsecurity.co.nz

You can request details about your personal information

You may contact us if you wish to find out about the personal information we hold about you by emailing us at fsg.billing@firstsecurity.co.nz. We will need to verify your identity before giving you access.

If your request is complex, we will ask you to put it in writing. We will respond to requests within 20 working days. We may charge you a reasonable fee for processing the request.

We may not be able to give you access

We may not be able to tell you what personal information we hold about you in certain

circumstances including where the information relates to anticipated legal proceedings or where the information would reveal commercially sensitive information.

Storing your personal information

First Security will take reasonable steps to securely store and protect the personal information we hold from misuse, loss and from unauthorised access, use, modification or disclosure.

International data transfers

In connection with providing the Services, you accept that your personal information may be disclosed to recipients in, or transferred to, or processed in, countries other than New Zealand. We may provide your personal information to third parties in countries other than New Zealand if we have reasonable grounds to believe the recipient is required to protect your personal information in a way that, overall, provides comparable safeguards to those required by New Zealand's privacy laws.

However, there may be differences between New Zealand's privacy laws and those of the overseas locations in which we may store and process your personal information. If we cannot ensure that recipients in those locations are required to protect your personal information using comparable safeguards to those under New Zealand's privacy laws then we will only provide your personal information to recipients in those locations if you authorise us to do so.

How long we keep your personal information

The length of time we keep your personal information depends on what it is and whether we have an ongoing need to retain it, for example, to provide you with the Services you have requested.

We may retain all personal information that we collect (on both our active systems and our archive systems), for as long as administratively necessary, in accordance with our information retention policies and disposal schedule.

To determine the appropriate retention period of your information, we consider the nature, sensitivity, appropriate legal obligations, the potential risk of harm from unauthorized disclosure, the purposes for which we process your information and whether these purposes can be achieved through alternative means.

Updating this Privacy policy

We may amend or update this Privacy Policy from time to time, and will notify you of any changes by posting an updated version on our website or by sending you a notice via email. It is your responsibility to check this Privacy Policy periodically for changes, and to keep your email address with us current.

If you continue to use our Services following notification of any changes to this Privacy Policy you agree to be bound by the Privacy Policy that is in effect at the time you use our Services. If you do not agree with any aspect of the updated Privacy Policy, you must immediately cease all use of our Services.

Communication with you

First Security is committed to complying with the Unsolicited Electronic Messages Act 2007. By providing your email address and/or mobile number or subscribing to receive communications from us, you consent to receiving emails and/or texts which promote our services. You can unsubscribe from these communications at any time by clicking the “Unsubscribe” link in any promotional communication.

What about links to other websites?

Our website may contain links to other websites that are not under our control. These websites may use cookies. It is the responsibility of those third parties to collect appropriate consents from you in order to permit their own cookies (to the extent this is required by law) and to inform you about the cookies they use. You should check the Privacy Policy on all third-party websites to ensure you are comfortable with third party cookies.

We have no responsibility for linked websites and provide them solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or warranties about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

Contacting Us

If you have any questions regarding First Security’s Privacy Policy please feel free to contact our privacy officer on <mailto:privacy@firstsecurity.co.nz> for further information.

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