

## **HORIZON ENERGY DISTRIBUTION LIMITED (HORIZON NETWORKS) AND HORIZON SERVICES LIMITED PRIVACY POLICY**

Horizon Energy Distribution Limited, trading as Horizon Networks, and Horizon Services Limited, in its capacity as provider of maintenance services to Horizon Networks (we, us, our) own, operate and maintain the physical infrastructure (poles and lines) that deliver electricity to properties in the eastern Bay of Plenty region. We are fully committed to ensuring that the way in which we receive or collect and handle personal information complies with the Privacy Act 2020, including the personal information of our customers, contractors and field service providers and those members of the wider community who we interact with in the course of our business operations.

### **1. INTRODUCTION**

#### **1.1 Overview**

This Privacy Policy explains how we may collect, hold, use and disclose information that identifies you (your personal information). If you would like to contact us in relation to this Privacy Policy or our use of your information, please email us at the details set out in the Contact us section below.

#### **1.2 Application of this Privacy Policy**

Please read this Privacy Policy carefully. It applies to any personal information that you provide to us or authorise us to collect. By signing up through your electricity retailer (either personally or on behalf your organisation) as a customer with us, becoming a contractor or field service provider to us, visiting our premises or website or otherwise providing us with personal information, you authorise us to collect, use and disclose your personal information in accordance with this Privacy Policy.

#### **1.3 Updates to this Privacy Policy**

We may update this Privacy Policy at any time by posting an updated version of this Privacy Policy on our website. The updated version of this Privacy Policy will take effect immediately upon such notice. We may also take additional steps to bring the changes to your attention, including by notifying you directly. We will update you of any material changes as required by law.

#### **1.4 Additional rights and obligations**

This Privacy Policy applies in addition to, and does not limit, our rights and obligations under the Privacy Act 2020 (as amended or replaced from time to time) (Privacy Act) or any specific authorisation that you provide to us when you interact with us.

## 2. COLLECTION OF PERSONAL INFORMATION

### 2.1 Types of personal information we collect

The personal information we collect will depend on your interaction with us. The personal information we commonly collect includes:

#### Customers connected to our network (or who have applied to be connected to our network)

<b>Customer profile and contact information</b>	including individual's name, title, address to which electricity services will be provided, telephone number, email address, other information disclosed to assist with any application
<b>Property information</b>	publicly obtainable information as well as information required to price our services and/or maintain our assets. This includes: ICP, connection type, access arrangements, hazards on the property, asset locations, asset details, plans and maps, property photos, GIS data, fault history, relevant dates, energy investments (e.g. solar, pumps, electric fence)
<b>Electricity usage data</b>	e.g. electricity consumption records
<b>Outages</b>	information about planned and unplanned outages that relate to your property
<b>Complaints and disputes</b>	the details of your complaint, such as the date of the event which is the subject of your complaint, what is alleged to have happened and any documents or other information provided in relation to the event, including correspondence and recordings of phone calls with us about the event
<b>Sensitive information</b>	medically dependent status (where provided by your electricity retailer)
<b>Records of individual service interactions</b>	recordings of the calls you make to our call centre and call centre notes

#### Contractors and field service providers

<b>Contact information</b>	including individual's name, title, address, telephone number, e-mail address
<b>Payment information</b>	such as bank account number, GST number, tax declaration, contact for accounts receivable
<b>Other</b>	information relevant to meeting our collective Health and Safety responsibilities such as employee competence, training records, audit information/reports

#### Website Visitors

<b>Contact information</b>	such as name, title, address, telephone number, e-mail address when you make an enquiry through our website
<b>Technical information</b>	information relating to your interaction with our websites that we automatically collect when you access or use our website (e.g. IP address, browser type, cookie information region browsing behaviour, website analytics)

## Community

<b>Site visitor information</b>	including individual's name, company, signature, and other basic identifying information entered in a visitor or site log when you visit our premises or a site that we are responsible for managing
<b>Contact information</b>	basic contact information when you make an enquiry through our website or by telephone or email

## 2.2 What happens if you do not provide us with personal information

You are not required to provide us with any personal information that we request. However, if you do not do so, we may not be able to provide electricity services to you, engage you (or the organisation you work for) to provide services to us or respond to your queries or complaints. We'll let you know if this is the case.

## 3. HOW WE COLLECT PERSONAL INFORMATION

Generally, we collect personal information directly from you. We do this through application forms, paper-based logbooks, phone calls to our call centre and website enquiry forms.

We also collect personal information from your electricity retailer that your retailer is required to provide to us through the Electricity Registry so that we can supply electricity to you. We may also collect your personal information from other third parties if you have authorised them to provide, or authorised us to collect, that information.

We may also collect information about you and your use of our website through the use of automatic data collection tools. These tools collect certain standard information about your access and computer, such as your browser type, operating system and language, access times and your Internet Protocol (IP) address.

**Cookies:** We may also collect information through cookies on our website. Cookies are small pieces of information that are stored on a user's computer. We may use cookies to personalise your experience on the website, make it easier for you to navigate our website, and improve your experience by storing your search, login details and order history. Cookies can be disabled via your web browser; however doing so may limit your access to some of the websites' content and features. We may also use cookies to track non-personally identifiable information such as usage and volume statistics, for research purposes in order to further develop our website.

**Information about other people:** If you provide us with, or authorise us to collect, personal information about another person, you confirm that they have authorised you to provide us, or authorise us to collect, their personal information in accordance with this Privacy Policy and that you have informed them of their rights to access and request correction of their personal information, as set out below.

## 4. USE OF PERSONAL INFORMATION

We may use your personal information for the purposes set out below:

### 4.1 Customers

- to create and maintain our customer records;
- to process your orders or applications for electricity services, including:
  - to connect your property to our network to allow us to supply electricity to you;
  - to change your connection or discontinue your supply;
- to contact you from time to time in relation to your electricity supply;
- to deal with your requests, enquiries or complaints and other customer care related activities;

- if the information about you has been received from your electricity retailer, for those purposes set out in our contract with the relevant retailer. The master version of that contract is available on our website: <https://www.horizonnetworks.nz/information-disclosure-regulation>; and
- enabling a third party organisation with a legitimate purpose to interact with you (e.g. beneficiary contact from Trust Horizon).

#### **4.2 Contractor and field service providers**

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- to assess tenders and proposals, including for the ability to do a job safely, reliably and efficiently;
- to carry out supply chain due diligence;
- to enable ongoing access by your company and staff to the Horizon Network;
- to interview and consider prospective contractors;
- to instruct, engage and pay for services;
- to contact you and your team; and
- to fulfil our site health and safety responsibilities.

#### **4.3 Website Visitors**

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- to analyse your use of our websites, personalise and improve your experience on our websites using cookies and similar technologies; and
- to respond to your website enquiry.

#### **4.4 Community**

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- to fulfil our site health and safety responsibilities; and
- to respond to enquiries made by you.

#### **4.5 Generally**

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- to comply with our legislative and regulatory obligations as an electricity distribution company;
- to facilitate our internal business operations (including personnel training, quality control and network monitoring); and
- for any other purpose authorised by you or permitted by law.

#### **4.6 Use of aggregated and anonymous information**

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We also use aggregated and anonymous information (where identifiable characteristics are removed, so that you will remain anonymous) for statistical and research purposes.

#### **4.7 How we may communicate with you**

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We may communicate with you by email and other electronic means.

## 5. DISCLOSURE OF PERSONAL INFORMATION

### 5.1 How we may share your information

We may share your personal information for the purposes set out in this section and in section 4 above with the following parties:

- our related companies who may use and disclose your personal information for the same purposes as us;
- in the case of customer information, to retailers (as required by the Electricity Industry Participation Code 2010);
- in the case of unresolved customers complaints and disputes, to Utilities Disputes Limited (<https://www.utilitiesdisputes.co.nz>);
- contractors and field services providers to assist us with the operation of our business;
- IT service providers for the purpose of processing, hosting or storing information on our behalf;
- authorities, regulators and professional advisers (including lawyers, bankers, auditors and insurers);
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets;
- to whatever party as may be necessary to lessen a serious threat to a person's health or safety or to assist with any request from Worksafe, the Ministry of Health or the District Health Board in relation to contact tracing for Covid-19; and
- any other party authorised by you or to whom we are required or authorised to disclose personal information in accordance with applicable law.

## 6. SECURITY AND STORAGE

### 6.1 Security

We take reasonable technical and organisational security measures to prevent loss or unauthorised access, use, alteration or disclosure of personal information you provide to us or authorise us to collect. We also require any contractors or service providers who require access to your information so that they can assist us with the operation of our business to implement reasonable technical and organisational security measures to protect your information.

### 6.2 Inherent risks

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will apply our normal procedures and comply with legal requirements to protect your information, we cannot guarantee the security of your information transmitted to or from the website and any transmission is at your own risk.

### 6.3 Links to third party websites

Our websites may from time to time contain links to and from other websites. If you follow a link to any of those sites, please note that those sites ought to have their own privacy policies and that we do not accept any responsibility or liability for those sites or for their privacy policies. Please check those privacy policies before you submit your information to those sites.

## 7. ACCESS AND CORRECTION OF PERSONAL INFORMATION

### 7.1 Your rights

Under the Privacy Act, you have the right to access and request correction of any personal information that we hold about you. Please refer to the Contact us section below.

## 8. CONTACT FOR FURTHER INFORMATION

**How to contact us:** If you have any questions or requests relating to this Privacy Policy or personal information that we may hold about you, please contact us on:

- **Address:** Horizon Energy Group, PO Box 281, Whakatane 3158, Attention: Privacy Officer
- **Email:** [privacy@horizonnetworks.nz](mailto:privacy@horizonnetworks.nz)