

# Privacy Policy

(External)

Edition, Date, Year



## Quality Statement

This document has been prepared for the benefit of Alpine Energy Ltd (AEL). No liability is accepted by AEL or any employee of this company with respect to its use by any other company(s) and/or person(s).

## Version Control

Version Number	Amendment Details	Date of Amendment	Amended By
1	New document	13/01/2021	John Creagh - Safety & Risk Manager
2	Reviewed document	21/07/2023	Jo Doyle - Governance Manager
3	Changed to new format	12/02/2025	Aidan Kozyniak
4			
5			

This guide is to be reviewed by 16 August 2025.

## Responsibilities

AEL employee responsibilities for this guide are tabled below.

Responsibility	Title
Approval	Board/Audit & Risk Committee
Owner	Head of Technology
Reviewer	Chief Digital Officer

## Approval

Formally adopted by	Signature
Chief Executive Officer	
Chief Financial Officer	

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## 1. Introduction

Alpine Energy Ltd (AEL) is committed to protecting the privacy of individuals. In order to conduct its business, AEL often needs to collect personal information about individuals. Personal information is any information about an individual that allows an individual to be identified.

AEL respects an individual's right to privacy and will work to ensure that the personal information collected about an individual is protected and not collected or used except in accordance with this Privacy Statement.

This Privacy Statement sets out what personal information may be collected, and how AEL may store, use, and share that information, in accordance with the Privacy Act 2020 (the Act).

## 2. Related policies and documents

The following policies and documents relate to this Policy:

- Privacy Policy - Internal
- CCTV Policy

## 3. Acceptance of this Privacy Policy

You accept this Privacy Policy, and authorise the collection, use, disclosure, storage, and retention of your personal information by us as described in this Privacy Policy when you interact with or use AEL's services.

## 4. AEL may Collect Personal Information about You

In order for AEL to provide services and conduct its business, AEL may need to collect personal information about you. This can include (but is not limited to):

- Your name;
- Your postal address, phone number and email address;
- Personal information provided when you interact with AEL or an AEL supplier or contractor, including via AEL's website, phone or teleconference, by letter, email, SMS, online messaging, on social media, or in person;
- Information you provide during any application process, including when you sign up for an account on AEL's Online Services portal;
- Information or material you upload to the Online Services portal;
- In relation to suppliers or contractors, contact details and any personal information provided when you commence a business or service relationship with us;
- The type of service you require from us;
- The address where you require AEL's service;

- Whether you or someone residing at your property (temporarily or permanently) is a medically dependent consumer (as that term is defined in the Consumer Care Guidelines issued by the Electricity Authority);
- Information about your transactions with AEL, including any requests, enquiries, and complaints you make to AEL;
- Power use at your property;
- Power produced at your property;
- Network issues at your property;
- Information collected incidentally when going about AEL work e.g., when video is used for aerial line monitoring and fault diagnosis;
- CCTV footage at AEL sites (including your image and certain vehicle details where relevant. That CCTV footage does not record sound); and
- Other information relating to your use of AEL services, any interaction you have with AEL, its assets or a supplier or contractor to AEL, or your business or service relationship with AEL.

AEL may store the above information for possible future communications relevant to the purpose of collection. AEL may also assign you or the address where you require AEL services a unique identifier, installation control point (ICP) number.

## 5. How AEL Collects your Personal Information

AEL will generally collect personal information from you directly, including (but not limited to):

- When you first contact AEL, requesting a new power connection;
- When you first commence a business or service relationship with AEL;
- While providing any of AEL services to you (or where any of AEL's agents or contractors do so);
- When you use AEL's website or the Online Services portal (including when you upload information or material to the Online Services portal);
- During your interactions and correspondence with us (including when you contact AEL teams to make any request, enquiry, or complaint to us);
- Through CCTV surveillance devices at AEL sites; and
- While conducting customer satisfaction and market research surveys.

To provide you with the service you need, AEL may also collect additional personal information from third parties where such collection is permitted or required by law, authorised by you, or is publicly available. Personal information may be collected from:

- Your electricity retailer;
- The Electricity Authority (including to verify your relevant ICP number(s));

- A contractor or other third party helping us to provide services to you; and
- Suppliers of services to us.

If you have provided AEL with personal information about another person, you warrant that you have that person's permission to do so. As part of this, you need to comply with your obligations under the Act and any other applicable privacy laws. For example, you may need to tell that other person that you have done so, that they have a right to access their personal information and that AEL will handle their personal information in accordance with this Privacy Statement.

## 6. Choice to Opt Out

If you are at all concerned about AEL collecting your personal information, you can ask AEL or your electricity retailer if it may be possible to opt out of providing it. While some information is essential to provide you with a service or for you to have a business or service relationship with AEL, AEL will let you know what information might not be essential, including if there would be any impact on the level of service AEL provides to you if you do choose to opt out.

## 7. Personal Information used for Appropriate Business Purposes Only

Your personal information will only be used for purposes connected with AEL's business, including to:

- Verify your identity and any information you provide to us (including your ICP number(s));
- Provide or maintain, or facilitate the provision or maintenance of AEL services;
- Improve AEL services and Online Services portal;
- Manage, maintain, and improve the network;
- Manage the relationship with you, including exercising and enforcing AEL's rights;
- Interact and communicate with you, including to notify you of network safety issues;
- Contact you about AEL services or other initiatives;
- Deal with your requests, enquiries, or complaints when you contact AEL team(s) (including any technical support issues relating to the Online Services portal);
- Purchase products or services from suppliers;
- Undertake marketing or market research;
- Manage risks associated with AEL's network, including protecting the safety of people who use or interact with AEL's network;
- Manage AEL's business generally;

- Comply with AEL's legal obligations; and
- As otherwise permitted or required by law, including the Act.

AEL may also use your personal information for other purposes for which you have given permission.

AEL may also use CCTV footage, if required, for detecting, deterring and investigating actual or potentially inappropriate or criminal behaviour at any AEL premises, and/or monitoring the safety and security of staff, visitors, and property.

AEL may use your personal information to analyse trends, see patterns in customers' use of the network and for statistical purposes such as demographics to help improve customer service, manage network capability, and meet legal obligations. Wherever practical, your information used in this way will be aggregated with that of other customers, so you are not personally identified.

## **8. AEL may Share your Personal Information in Certain Circumstances**

To help AEL with any of the purposes set out in this Privacy Statement, AEL may provide some of your personal information to:

- Authorised AEL employees, contractors, suppliers, and agents;
- Affiliated and related companies;
- Other third-party providers who help us provide services;
- AEL advisors;
- A business that supports AEL services (e.g., a business that hosts or maintains AEL's IT system, data centre or website);
- Service providers commissioned to protect the rights, property, or safety of AEL or others;
- Any court, tribunal, regulatory authority, or public sector agencies or other person or organisation where disclosure is required or allowed by law; and
- Any other person authorised by you, or by law.

AEL will take reasonable steps to ensure that your personal information is not used by third parties for any other purpose.

## **9. Transfer of Personal Information outside of New Zealand**

AEL may from time-to-time store and/or transfer personal information to third parties outlined above who are located outside New Zealand. If this happens, AEL will ensure your personal information will be protected by comparable safeguards to those in New Zealand law. If your personal information will not be protected by comparable safeguards to those in New Zealand law, you will be informed, with your personal information only transferred with your consent.

## 10. AEL will Protect your Personal Information

Reasonable steps will be taken to ensure that the personal information AEL collects, uses, or discloses is accurate, complete, and up to date.

AEL takes reasonable steps to protect personal information held by us from misuse, loss and unauthorised access, modification, or disclosure, including through the use of technical and physical security measures.

Although we take reasonable steps to ensure that personal information held by us (or on our behalf) is protected and held securely, we do not make any warranties in relation to the security of any personal information you disclose or transmit to us and we are not responsible for the theft, destruction, or inadvertent disclosure of your personal information where our security measures have been breached. Any transmission of personal information is conducted at your own risk.

If a privacy breach occurs which has caused or may cause serious harm to you, AEL will notify you of this as soon as practicable either directly or, if that is not reasonably practicable, by public notice and to the Privacy Commissioner as required by the Act.

## 11. You can access the Personal Information AEL holds about You

You agree that any personal information you provide to AEL will be accurate, correct, and up to date.

You must inform us if any of your personal information changes, to ensure that the details we hold about you are up to date and correct.

Subject to the exceptions set out in the Act, you have right to access personal information that AEL holds about you, and to request AEL amend it if it is incorrect. To do so, contact AEL using the contact details set out at the bottom of this Privacy Statement. AEL may require you to contact your electricity retailer if AEL received the incorrect personal information from them, in order to achieve a permanent correction. If AEL is not willing to correct errors that you have identified in your personal information, you may request that we take reasonable steps to attach a statement to the personal information noting the correction sought.

In some cases, there may be a reasonable charge associated with providing copies of your personal information to you. If so, AEL will let you know before sending your information to you.

Some information AEL holds is necessary to supply you with a service.

## 12. AEL will Dispose of your Personal Information once no Longer Needed

AEL will take all reasonable steps to ensure that your personal information is securely destroyed or deleted, once it is no longer needed for the purpose for which it was collected. AEL may be required by law to retain certain personal information.

AEL CCTV footage recordings are retained for no longer than they are required for the purposes as set out in this policy. AEL may retain CCTV footage for longer if required by



law, or if AEL thinks doing so is appropriate to help it with any of the purposes outlined above.

### **13. Links to Third Party Sites**

This Privacy Statement only relates to this website and services. AEL's site may contain links to other third-party sites. AEL is not responsible for the privacy practices or the content of other websites. You should check their privacy policies before providing personal information to them or any other third party.

### **14. AEL may Amend this Privacy Statement**

AEL may amend this Privacy Statement at any time. Any amended Privacy Statement will be posted on AEL's website, setting out the reasons for the amendment. An amendment will be effective from the time it is publicly disclosed on AEL's website.

### **15. Further Information**

Alpine Energy Limited is the agency collecting and holding your personal information. AEL's address is 24 Elginshire Street, Washdyke, Timaru 7940

You can call AEL on 0800 66 11 77 or email AEL at [mailbox@alpineenergy.co.nz](mailto:mailbox@alpineenergy.co.nz) to:

- Obtain information about how AEL manages the personal information held;
- Obtain access to the personal information AEL holds about you in accordance with the Act and this Privacy Statement;
- Make a complaint if you believe AEL has breached your privacy; and
- Ask for the personal information AEL holds to be corrected on AEL's database.

You can also visit New Zealand Privacy Commissioner's website [www.privacy.org.nz](http://www.privacy.org.nz).