
Privacy Policy

&BLOOM

Last Updated on 04 January, 2024

Introduction

At &BLOOM, we are dedicated to protecting your privacy. This Privacy Policy outlines how &BLOOM (comprising Sydney August Straver T/A &BLOOM and its operations) collects, stores, utilizes, and shares your personal information. Personal information, as defined herein, encompasses data that can identify you, including, but not limited to, your name and contact details.

This Privacy Policy is applicable to all products and services provided by &BLOOM, including those delivered electronically, and is relevant to users in New Zealand and overseas. By engaging with our products and services, you grant us permission to collect, store, use, and share your personal information in accordance with this Privacy Policy. Additional privacy terms within the Terms and Conditions of our products and services may also apply, and this policy may extend beyond the closure of your account or the conclusion of your relationship with us.

In alignment with the prevailing privacy legislation and subsequent updates, the New Zealand government has enacted measures to safeguard personal information. The Privacy Act 2020, denoted as "the Act," integrates New Zealand's Privacy Principles ("NZPP"). These principles specifically pertain to private sector organizations involved in managing information related to individuals. The legislative framework aims to protect the confidentiality of personal information and establishes guidelines for its proper handling.

Additionally, effective from May 25, 2018, the EU General Data Protection Regulation ("GDPR") was introduced to enhance transparency in data protection, particularly for businesses transferring data to the European Union ("EU"). While the GDPR and NZPP share commonalities, &BLOOM is committed to implementing comprehensive privacy policies and procedures for its staff and clients. This commitment encompasses adherence to all requisite NZPP's, ensuring the provision of a clearly articulated and readily available Privacy Policy. This objective is achieved through the presentation of this Privacy Policy. This policy serves as notice to all individuals ("Data Subjects") regarding the collection, use, and safeguarding of Personal Information during the provision of our services.

Please take the time to read this Privacy Policy alongside our Terms and Conditions (if applicable), as well as any other privacy notices provided on specific occasions. This collective information ensures your full awareness of how and why &BLOOM processes your data, and this Privacy Policy complements, rather than overrides, other applicable notices.

Information Collected

&BLOOM gathers information as part of its routine business operations, specifically in connection with the provision of goods and/or services to clients. This information is collected when an individual engages with &BLOOM as a customer or acts as a guarantor for another individual or company utilizing &BLOOM's services. Our information collection practices are tailored to the standard business procedures, ensuring that the data collected is pertinent and sensitive only to the extent necessary for the normal course of business.

Personal information that &BLOOM may collect includes, but will not be limited to:

- Full name;
- Date of birth;
- Address;
- Credit references (if applicable);
- Publicly available information which relate to the client activities in New Zealand and/or overseas;
- Any information recorded in the New Zealand Insolvency Trustee Service Register (if applicable);
- Electronic contact details including (but not limited to) email, Facebook and LinkedIn details;
- Next of kin and other contact information;

- Billing or purchasing information.

&BLOOM employs cookies on its website. These are compact files stored on your computer, intended to retain a modest amount of data, which may include personal information specific to a particular client and website. These files can be accessed by the web server or your computer. Unless these cookies are strictly essential for the provision of &BLOOM's services, the firm will seek your consent for their use during the initial visit to the website.

In the event that you use our website for the purpose of purchases or orders, &BLOOM commits to displaying a reference to cookies and/or similar tracking technologies, including pixels, tags, and web beacons if applicable. Your consent is requested for &BLOOM to collect personal device and technological data information, which may encompass, but will not be limited to:

- IP address, browser and device characteristics, language preferences, and other similar details;
- Log files tracking of website usage and traffic;
- Reports accessible to &BLOOM when sending emails to Clients, enabling the collection and review of pertinent information.

If you consent to &BLOOM's use of cookies on our website and later decide to withdraw your consent, you can manage and control privacy settings through your browser. This includes removing cookies by deleting them from your browser history when leaving our website.

&BLOOM prioritizes the security of its infrastructure and regularly conducts internal risk management reviews. These reviews aim to ensure that our systems are, to the best of our knowledge, secure, and any identifiable risks are mitigated within the normal course of our business operations.

Utilizing our services may entail providing additional information, such as data derived from surveys and comments posted on online forums. When using our services through social media platforms, such as LinkedIn, &BLOOM will receive specific profile information from the social media provider. The extent of this profile information may vary depending on the social media platform, typically encompassing details such as the client's name, email address, friends list, profile picture, and other information chosen to be made public. Additionally, &BLOOM may seek access to other permissions associated with the account, such as friends, check-ins, and likes, with clients having the choice to grant or deny access to each specific permission.

Collectively, all the aforementioned information is referred to as the "personal information" of the data subject.

Use and Sharing of Information

&BLOOM may share your information with third parties to facilitate the provision of our goods and/or services. By providing personal information to us, you affirm that you are authorized to disclose such details and consent to the verification of your information with relevant issuers or official record holders through third-party systems to confirm your identity. Moreover, you grant us the authority to disclose this information to third parties as part of our standard operations for the delivery of our consulting services and any other purposes outlined in our Standard Terms of Engagement.

&BLOOM adheres to a strict policy regarding the disclosure of your personal information to third parties, seeking your explicit consent before sharing any such data.

In alignment with applicable regulations, including the EU GDPR where relevant, &BLOOM ensures that personal information is utilized solely for specific purposes, including:

- Providing services and products;
- Marketing &BLOOM's products and services;
- Engaging in day-to-day business operations, encompassing compliance with IRD requirements, managing accounting returns, legal matters, and other routine business purposes;
- For any other purpose authorised by the data subject or the Privacy Act or the GDPR.

&BLOOM collects information strictly for its designated purposes (primary purpose), and in accordance with relevant regulations, such as the Privacy Act and the GDPR, will not disclose this information for any alternative purposes without mutual agreement.

Storage and Security of Information

Your personal information, whether maintained in paper files or electronically, will be securely stored in data centers located in New Zealand or overseas. These data centers are owned by external service providers.

To ensure the utmost protection against loss and unauthorized use, access, modification, or disclosure, &BLOOM implements a comprehensive set of physical and electronic data security measures. These measures include:

- Controlled access to information systems through identity and access management;
- Adherence to information security policies that bind employees to the secure handling of information;
- Mandatory information security training for all employees;
- Regular monitoring and review of compliance, both internally and with our service providers, against internal policies and industry best practices.

When personal information is collected through our services, especially online interactions, it undergoes a secure transmission process via our servers, utilizing encryption technology to safeguard it during transit over the internet. Additionally, all stored personal information is shielded from unauthorized access through the use of recognized security procedures, such as passwords and PINs.

User Rights

You hold the right to request a copy of all the information retained about you by &BLOOM. In addition, you are entitled to request corrections to any information that is incorrect, outdated, or inaccurate. To initiate such requests, please reach out to the following contact details:

- Phone: +64 (0) 20 4161 2937
- Email: sydney@bloomsustainability.co

&BLOOM is committed to fulfilling your requests promptly. Upon receiving your request via phone or email, &BLOOM will take the necessary actions, including correction or, if applicable, destruction of personal information. Exceptions to destruction may apply if the information is essential for the fulfilment of &BLOOM services or is required to be retained in accordance with legal obligations.

Breaches

&BLOOM recognizes its responsibilities under Privacy Act legislation and commits to notifying clients promptly in the event of a potential data breach that may pose serious harm. Additionally, for clients located in the EU, &BLOOM acknowledges the application of GDPR provisions to safeguard against potential data breaches.

Where applicable to data processing under the GDPR, especially in instances where &BLOOM adopts new technologies, and considers that such processing, given its nature, scope, context, and purposes, is likely to pose a high risk to the rights and freedoms of individuals, &BLOOM will conduct, before processing personal information, an impact assessment on the

envisaged processing operations, known as a Privacy Impact Assessment (PIA). This data protection assessment is mandatory in scenarios involving:

- A systematic and extensive evaluation of personal aspects concerning individuals, relying on automated processing, including profiling, and forming the basis for decisions with legal effects on or similarly significant impacts on the individual;
- Large-scale processing of special categories of data outlined in Article 9(1) of the GDPR, or personal data pertaining to criminal convictions and offenses as per Article 10 of the GDPR;
- Systematic monitoring of a publicly accessible area on a large scale.

The assessment will adhere to the guidelines of Article 35(7) of the GDPR, with periodic reviews of these data protection impact assessments conducted in case of any changes in the risk associated with the processing of personal information.

Contact Us

For any further information and/or questions related to &BLOOM's Privacy Policy or practices, please contact us by e-mail at sydney@bloomsustainability.co.