



**PRIVACY NOTICE**

**EMPLOYEE AND  
APPLICANT  
PERSONAL  
INFORMATION**

## PRIVACY NOTICE - EMPLOYEE AND APPLICANT PERSONAL INFORMATION

This privacy notice describes how BDO in New Zealand, which includes BDO New Zealand Ltd., and all BDO Independent Member Firms across New Zealand ('BDO', 'we', or 'us') collects and processes personal information about you; how we use and protect this information; and the choices you can make about how we use this information.

This privacy notice applies to all personal information we collect about you as an applicant to or an employee of BDO. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

### 1 INFORMATION WE COLLECT

We may collect your personal information from a variety of sources, including information we collect from you directly (e.g., when you apply for a job, during your employment, following termination of employment, etc.), and information we collect about you from other sources (where permitted by law).

Certain personal information is required because of the contractual relationship we have with you when we employ you, to enable us to carry out our contractual obligations to you. Failure to provide this information may prevent or delay the fulfilment of these obligations.

#### 1.1 Information we collect directly from you

The categories of information that we may collect directly from you include the following:

- (a) personal details (e.g., name, age, date of birth);
- (b) contact details (e.g., phone number, email address, postal address);
- (c) family contact personal details (e.g., emergency contact details);
- (d) other information about you and your family (e.g., gender, marital status, family status)
- (e) educational and career background (e.g., transcripts, your curriculum vitae);
- (f) employment details (e.g., career planning reports, annual review reports, job start date, job end date);
- (g) employment and salary administration (e.g., IRD number, salary amount, bank details, benefit details);
- (h) other relevant data in respect of your job application or employment with us or members of the BDO network (e.g., job location, working conditions, special needs, special leave, holidays, etc.);
- (i) data regarding special agreements (e.g., study allowances, guarantees for mortgage loans, health insurance allowances, etc.);
- (j) right to work information; and
- (k) health and safety information

## 1.2 Information we collect from other sources

The following are examples of the categories of information we may collect from other sources. These sources include former employers, recruitment agencies, and pre-employment vetting agencies.

- (a) personal details (e.g., name, age, date of birth);
- (b) contact details (e.g., phone number, email address, postal address);
- (c) educational and career background (e.g., references from former employers)
- (d) other information about you and your family (e.g., gender, marital status, family status)
- (e) employment administration data (e.g., tax payment details)
- (f) details of criminal records
- (g) psychometric testing information

## 2 HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information in relation to your job application and (current or past) employment with us, to:

- (a) carry out our obligations to you under your employment contract;
- (b) exercise our rights under your employment contract;
- (c) provide any services you request from us;
- (d) to keep our records accurate and up to date;
- (e) comply with legal obligations to which we are subject (e.g., Health and Safety at Work Act 2015); and
- (f) to fulfil our legitimate business interests

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfil our contractual obligations to you, for example to ensure that your salary is paid correctly, and for ensuring you have appropriate access to our premises;
- (b) to meet our legal obligations to you as your employer, for example health and safety obligations while you are on our premises; or to a third party (e.g., tax authorities); and,
- (c) to meet our legitimate interests, for example to ensure that we can provide you with any services, for example HR services from us, and that our records are kept up to date and accurate. When we process your personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms. For more information about the balancing test that we carry out to process your personal information to meet our

legitimate interests or if you want to object to these uses of your personal information, please contact us at the details below.

### **3 YOUR RIGHTS OVER YOUR PERSONAL INFORMATION**

Please let us know if any of the personal information that we hold about you changes so that we can correct and update the information on our systems.

You can view, correct, or update the personal information you provide to us by using the form given in Annexure 1 of our Privacy Policy.

In certain circumstances you may object to specific processing activities, activities (including where we rely on our legitimate interests as set out above), require us to restrict how we process your personal information and ask us to share your personal information in a usable format with another company. Where you have given your consent to a particular type of processing, you may withdraw that consent at any time.

To exercise any of the above rights, please contact us using the contact details set out below.

### **4 INFORMATION SHARING**

In general, we do not share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis for doing so.

We rely on third-party service providers to perform a variety of services on our behalf, which include recruitment platforms, pre-vetting, and psychometric testing agencies. This may mean that we have to share your personal information with third parties. When we share your personal information in this way, we put in place appropriate measures to make sure that our service providers keep your personal information secure.

Other situations in which we may disclose your personal information to a third party, are:

- (a) in the course of a sale or an acquisition of BDO, any shares in BDO or any of BDO's assets;
- (b) where permitted by law, to protect and defend our rights and property; and
- (c) when required by law, and/or public authorities.

### **5 INFORMATION SECURITY**

We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration, or destruction. We require all employees and principals to keep personal information confidential and only authorized personnel have access to this information.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period that enables us to: maintain our business records for analysis and/or audit purposes; comply with record retention requirements under the law; defend or bring any legal claims; and deal with any complaints.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

## **6 INFORMATION TRANSFER**

Your personal information may be transferred to, stored, and processed in a country other than New Zealand (e.g., Australia). When we do so, we transfer the information in compliance with applicable data protection laws.

Where the transfer is to a country which provides a lower level of protection, we will take steps to ensure the security and confidentiality of your personal information in accordance with applicable data protection law, including using the guidance and Model Contract Clauses provided by the Office of Privacy Commissioner New Zealand, and for transfers to other BDO Member Firms, we use the BDO Global Privacy Policy, BDO's Binding Corporate Rules for Controllers and Processors. If you wish to see a copy of the relevant mechanism that we use to transfer your personal information, please contact us using the contact details set out below.

## **7 CHILDREN'S PRIVACY**

We may process personal information of your family members, including your children. When we do so, it will be in compliance with data protection laws as they apply to children.

## **8 CONTACT US**

If you have questions or concerns regarding the way in which your personal information has been used, please contact the Privacy Champion using the form provided in Annexure 1 of our Privacy Policy.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the [Office of Privacy Commissioner](#).

## **9 CHANGES TO THE PRIVACY NOTICE**

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time. You will be able to see when we last updated the privacy notice because we will include a revision date. Changes and additions to this privacy notice are effective from the date on which they are posted.

**AUGUST 2022**  
**Version 1.0**

**Next Due for Revision: July 2023**