

Privacy Policy

Frame Consulting Limited (“**us**”, “**we**” or “**our**”) respect your privacy. In this Privacy Policy (**Policy**), “**you**” and “**your**” means the individual providing Personal Information to us.

This Policy provides information in relation to the basis upon which we collect, hold, use and disclose Personal Information given to us by candidates, as well as information from third parties that candidates authorise us to access (such as information from referees). The Policy also applies to Personal Information we collect in the course of dealing with client organisations.

Personal Information has the same meaning as in the Privacy Act 2020 (**Act**). In essence, it is information relating to an individual which can be used to identify that individual or which is linked to an identified individual.

By accessing our website, registering and dealing with us as a candidate or client, contacting and communicating with us, or using any of our other services, you agree to the terms of this Policy.

1. Updates to this Policy

- 1.1 We will review this Policy from time to time to make sure it takes into account new laws and technology, and any changes to how we operate.
- 1.2 Should we decide to change our Policy we will post all changes on our website so that you are always kept up to date.
- 1.3 Use and disclosure of Personal Information collected from you is subject to the Policy in effect at the time such Personal Information is collected, unless otherwise agreed.

2. Collection of Personal Information

- 2.1 The Personal Information we collect and hold includes (but is not limited to) your name, contact details, recruitment information (i.e. work history, qualifications, and other information contained in your cover letter and resume), your entitlement to work in New Zealand, certain medical information and criminal conviction history. We may also collect any personal information contained in the content of your registration form, or your communications with us.
- 2.2 We collect your Personal Information when you provide it to us, including when you register for and use our services as a candidate or client, when you contact us (whether in person, over the phone, via email, through our website, or through our social media accounts), or when you interact with the marketing communications we send you.
- 2.3 Our website may automatically collect log information about your access to our website, including time of access, IP address, browser type, sites you visited prior to visiting our website, clicks and device identifiers. This information may be collected through third party tools such as cookies.
- 2.4 If you access this website or contact us from outside of New Zealand, you agree that any Personal Information you provide us is subject to this Policy and the Act.
- 2.5 Your Personal Information may also be collected from third parties you authorise us to contact, for example referees, or by agents who are authorised by you to provide such information, or as otherwise permitted by the Act.
- 2.6 This website may also state other ways in which we collect information from you.

- 2.7 If you do not provide the Personal Information that we ask you to provide, or the information is incorrect, we may not be able to provide the requested services to you, respond to an enquiry, or contact you.

3. Third Parties

- 3.1 If you provide Personal Information relating to another individual, such as a referee, you warrant you are authorised to do so and that you have ensured the individual is aware of the information in this Policy. If you provide us Personal Information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us.
- 3.2 We also use social media services like LinkedIn, Instagram and Facebook. These services may be linked to this website through the use of social media buttons. Your use of these third party services is entirely optional. We may make use of any information that you make public in relation to our business, when you use any such third party services, for the purposes of our business.
- 3.3 All third party services are governed by the privacy policies and/or practices of the relevant third party, for which we are not responsible. If you do not want to provide Personal Information to any of those third parties, or make information publicly available, you should not use their particular service.

4. Purposes for which we collect and use your Personal Information

- 4.1 We may collect, use and disclose your Personal Information for the following purposes:
- 4.1.1 to communicate with you, which includes responding to any message or enquiry you send us and identifying you when you want to communicate with us;
 - 4.1.2 to provide you with the services, or take steps to provide you with the services, you have requested from us;
 - 4.1.3 to provide your details to prospective employers (where you have authorised us to do so);
 - 4.1.4 to make inquiries and collect information about you from third parties, such as referees or background checking agencies (where you have authorised us to make such inquiries);
 - 4.1.5 to send you job alerts and other communications related to job opportunities;
 - 4.1.6 to send you our newsletters, to keep you updated with our services, and to provide you with our marketing material from time to time, such as special offers and promotions (where you have signed up to receive these marketing communications);
 - 4.1.7 to conduct our business, which may include reviewing, analysing and improving our own processes;
 - 4.1.8 to optimise your experience as either a customer of our services, or as a user of this website;
 - 4.1.9 to take any action in any case of dispute, or legal proceeding of any kind between you and us, or between you and any other person with respect to our business;
 - 4.1.10 to comply with our legal obligations;

4.1.11 for us or other authorised agencies to detect, investigate, prevent or address fraud, security or technical issues;

4.1.12 for the purposes of carrying out the matters noted in the section below on the '*Management of Personal Information*'; and

4.1.13 any other purpose made known to you when collecting the Personal Information.

4.2 Other sections of this Privacy Statement also set out other specific situations in which your personal information is collected, held, used and disclosed.

4.3 We may use and disclose your personal information for any of these purposes, or for any other purpose authorised by you or by the Act and any other applicable privacy laws.

5. Cookies

5.1 Our website uses cookies and similar technologies. A cookie is a small data file stored on a device with a web browser (e.g. computer or ipad). It can contain information about your device, your IP address, your session, and the online activity on this website of anyone using your device.

5.2 Our website is hosted by Squarespace and uses functional/required and analytics/performance cookies.

5.3 Functional and required cookies are always used, which allow Squarespace to securely serve this website to you. Analytics and performance cookies are used on this site to view site traffic, activity, and other data. Further information on these cookies can be found [here](#).

5.4 While Squarespace is primarily collecting this data on our behalf, it may also use the data which is collected for its legitimate business interests, including to improve its own services, and to maintain the security of its systems. To understand the ways that Squarespace may use your data, please read its privacy policy, available [here](#).

5.5 If you do not agree to the use of cookies, or would like to block some or all of the cookies on our website, you can manually disable or reject the use of cookies through your internet browser.

5.6 If you disable or reject the use of cookies some functionality on this website may not be available.

6. Marketing Communications and Disclosure of Personal Information

6.1 We may disclose your Personal Information to third party providers we use to assist us to send marketing communications. We provide those third parties with your name and email. Such third parties may be offshore and may not have privacy laws as comprehensive as in New Zealand.

6.2 Where marketing communications we initiate are sent by electronic means, the relevant third party (where applicable) will collect your interaction with the communication. The information collected includes whether you opened the email, the links you clicked on, the webpages viewed and the dates and times of such access and activity. The third party provides or makes available this information to us for the various purposes outlined in this Policy. They also hold this information on our behalf.

6.3 We use Squarespace to assist us in sending marketing communications. Squarespace is located in the United States. Please read their privacy policy, available [here](#), to understand the ways in which they collect, hold, use and disclose such Personal Information. If you do not agree with how they will handle your Personal Information then you will need to

unsubscribe from receiving marketing communications from us. We may change our provider at any time, and your information will be subject to the privacy policy of that new provider.

- 6.4 You may unsubscribe from receiving marketing communications from us in accordance with the unsubscribe facility in any email sending you marketing communications.
- 6.5 We will not be able to provide marketing communications to you if you unsubscribe or do not agree to our use of third parties to assist us with our marketing communications.

7. Management of Personal Information

- 7.1 Except as otherwise stated in this Policy, your Personal Information we collect is held by us. Our address is set out below.
- 7.2 We may transfer Personal Information to other third party providers (including technology providers, providers services and providers of software tools used by us in our business) to perform services on our behalf, including to confirm that referee details you have provided are true and accurate, to process the information for us, or hold it on our behalf. These third parties may be offshore, but we will not authorise them to use such information for their own purposes.

8. Your Rights

- 8.1 You have the right of access to, and correction of, your Personal Information. To access or correct any of your Personal Information, please contact us as follows:

Email: [\[rachel@frameretail.co.nz\]](mailto:rachel@frameretail.co.nz)

Address: [\[address\]](#)

- 8.2 We endeavour to ensure that the Personal Information we hold is accurate, complete and up-to-date. If any of the Personal Information that you have provided to us changes we encourage you to contact us to update that Personal Information.
- 8.3 If a dispute arises between us and we cannot resolve it with you, then you may wish to contact the Office of the Privacy Commissioner on investigations@privacy.org.nz.

9. Governing Law

- 9.1 This Policy is governed by the laws of New Zealand.