

## **Wearne & Jacobsen Limited – Privacy Policy**

Effective from: 23 July 2025

### **1 Details of this Privacy Policy**

- 1.1 This policy explains how Wearne & Jacobsen Limited ("**Wearne & Jacobsen**") collects and handles your information across its related divisions. In this policy, each reference to Wearne & Jacobsen (including terms such as "we" and "us") includes our related divisions.
- 1.2 This Privacy Policy applies to all personal information under the control of Wearne & Jacobsen. It does not apply to other personal information collected or held by other entities outside of our control, or to the personal information of our employees, contractors or directors.
- 1.3 In this Privacy Policy, personal information has the meaning given to it in the Privacy Act 2020 ("**Privacy Act**"), which is any information about an identifiable individual and includes information relating to a death maintained under the Births, Deaths, Marriages, and Relationships Registration Act 2021 ("**Personal Information**").
- 1.4 We will not use, disclosure or share Personal Information that we collect, except as set out in this Privacy Policy (or otherwise as permitted or required by law). This Privacy Policy does not limit or exclude any of your rights under the Privacy Act.
- 1.5 This Privacy Policy also covers how we make the Personal Information that we hold available to you for access and/or correction by you in the event that such information is inaccurate or incomplete. Whenever we handle Personal Information, we take steps to ensure that appropriate standards of privacy practice and security are applied.
- 1.6 By interacting with us and/or using our services as set out in this Privacy Policy, you permit us to collect, store, use and disclose your Personal Information in accordance with this Privacy Policy.

### **2 Collection of Personal Information**

- 2.1 Wearne & Jacobsen collects Personal Information in the course of our business. We will collect your Personal Information in a variety of ways, including directly from you, from publicly available information, from relevant third parties (for example, identification service providers, hospitals or hospice care, rest homes, doctors or other healthcare providers, credit reporting agencies, debt collection agencies, social media outlets, or marketing companies), and sometimes automatically as set out in this Privacy Policy.
- 2.2 Wearne & Jacobsen may collect Personal Information when you:
  - (a) enter into an agreement with us to receive a service;
  - (b) breach an agreement you have entered into with us, including in relation to payment for our services;
  - (c) communicate with us by telephone, email, post, or via social media, including when you enquire about receiving a service;
  - (d) visit us in person at an office;
  - (e) pay for our services; and/or
  - (f) visit any Wearne & Jacobsen website ("**Website**").
- 2.3 The types of Personal Information we collect may include, but are not limited to your name, contact details (phone, email, mailing address), payment details, and information about your next of kin (if applicable).

- 2.4 When you engage our services on behalf of someone else (for example, the deceased), we will also collect information regarding your relationship to such individual, as well as your authority to act on their behalf. In such circumstances, you are deemed to have authority to provide that individual's Personal Information to us, and to have confirmed we may deal with that individual's personal information in accordance with this Privacy Policy.
- 2.5 You can choose not to provide us with your Personal Information, but this may limit the services we are able to provide.

#### *Website*

- 2.6 We do not collect personally identifiable information from you when you use our Website. However, we do collect information from your device to understand how you use our Website and how we can improve our services.
- 2.7 This Website information is collected by:
- (a) using cookies;
  - (b) collecting Website use information, including user location, and internet protocol (IP) addresses; and
  - (c) analytical tools that we may operate, including but not limited to Google Analytics and Weebly based reporting for website traffic and website activity.
- 2.8 Cookies are small text files placed on your device to collect information about how you browse the Website. The data collected by them may include:
- (a) your IP address and the device you used to access the website;
  - (b) the search terms you used;
  - (c) the pages you accessed on our Website and the links you clicked on;
  - (d) the date and time you visited our Website;
  - (e) the referring website from which you clicked to reach our Website, if applicable;
  - (f) your operating system (e.g. Mac OS X, Windows XP); and
  - (g) the type of web browser you use (e.g. Mozilla Firefox, Google Chrome).
- 2.9 You can disable cookies by setting your browser to not accept them. If you disable cookies, you may not be able to use all features on our Website.

#### *Online Marketing*

- 2.10 We may use the Personal Information we collect from you to market and advertise our services to you. We may also engage third-party digital marketing providers to market and advertise our services to you.
- 2.11 If you receive marketing communications from us, which may include digital marketing, you can unsubscribe from doing so at any time by contacting us at [info@ninness.co.nz](mailto:info@ninness.co.nz)

### **3 Use of Personal Information**

- 3.1 We will not use or disclose your Personal Information except in accordance with this Privacy Policy and the Privacy Act. The Personal Information we hold about you may be used or

disclosed for any of our business purposes and for related purposes including, but not limited to:

- (a) confirm or verify your identity;
- (b) provide you with our services;
- (c) provide our Website to you;
- (d) facilitate and administer your account with us;
- (e) invoice you and/or process payments from you;
- (f) communicate with you, including responding to emails, calls, requests and/or feedback;
- (g) carry out credit checks, debt recovery, and/or debt collection;
- (h) improve our Website to give you a better user experience;
- (i) advertise and market our services to you;
- (j) promote and market the goods and/or services of our related entities and/or third-party service providers to you;
- (k) carry out our general business and administrative functions;
- (l) protect and/or enforce our legal rights and interests, including defending any claim; and
- (m) for any other reason permitted or required under the Privacy Act.

3.2 If there are any other purposes which are not directly related to and other than those discussed above for which we propose to use your Personal Information, we will notify you and request your consent.

#### *Aggregate Information and Statistics*

3.3 We may use aggregated information from our Website to improve the quality of our Website, services, and for any statistical and market research purposes. This aggregated information is not associated with any individual person. We may use this data in aggregate form as a statistical measure, but not in a manner that would identify any individual personally.

## **4 Disclosure of Personal Information**

4.1 We do not sell, lend, trade, rent, exchange, or otherwise disclose your Personal Information to any third party without your permission.

4.2 Personal Information may be disclosed to third parties for the purposes outlined above at clause 3, and for directly related purposes, including those required by the Privacy Act.

4.3 Some of these third parties may include, but are not limited to:

- (a) third party service providers, suppliers or contractors with whom we do ordinary business (including cemeteries, celebrants, caterers, mailing service providers, credit reporting agencies, debt collection agencies, email marketing providers, digital solutions and distribution platform providers, analytics providers and web content management providers); and
- (b) third party service providers who provide us with data storage, software, webhosting and servers.

## **5 Storage and Security of Personal Information**

- 5.1 We store information in physical and electronic format at our premises, which may include storage on the cloud. We take all reasonable steps to ensure that we keep your Personal Information secure, both in electronic and hard copy format, and to protect against loss, unauthorised access, use, modification, disclosure, or other misuse.
- 5.2 Any organisations that provide us with support services are required to appropriately safeguard the privacy of any Personal Information provided to them. Without limiting the foregoing, we may store your Personal Information using third party cloud-based services and storage subject to appropriate safeguards.
- 5.3 We will primarily collect and process Personal Information in New Zealand. However, because our Website can be accessed from outside New Zealand, Personal Information may be collected from people elsewhere in the world. The third party service providers that we partner with may also collect, process and store Personal Information outside of New Zealand.
- 5.4 If at any time we need to send Personal Information outside of New Zealand to an overseas agency that may use any Personal Information for its own purposes, we will:
- (a) take steps to ensure that we believe on reasonable grounds that the overseas agency receiving the Personal Information is subject to privacy protections that, overall, provide comparable safeguards to those provided under the Privacy Act; or
  - (b) enter into a binding contractual agreement with the overseas agency receiving the Personal Information confirming that it will protect the Personal Information in a way that, overall, provides comparable safeguards to those provided under the Privacy Act; or
  - (c) obtain the express authorisation of the individual concerned to disclose their Personal Information overseas after expressly informing them that the overseas agency may not be required to protect the information in a way that provides comparable safeguards to those under the Privacy Act.

## **6 Retention of Personal Information**

- 6.1 We will retain your Personal Information for as long as it is required for the purpose/s for which it was collected, or otherwise as required by law.
- 6.2 We regularly review the data we hold and, in most cases, once Personal Information is no longer required, we will securely destroy it or otherwise delete all identifying details so that only anonymised data is retained.

## **7 Accuracy and Right to Access and Correct**

- 7.1 We take reasonable steps to ensure the Personal Information we hold is accurate, up to date, complete, relevant and not misleading.
- 7.2 You can request access to, or correction of, any Personal Information we hold about you. If you make an access or correction request, we will ask you to verify your identity, and we may ask you to specify what information you require.
- 7.3 Subject to certain grounds for refusal set out in the Privacy Act, if you believe that your Personal Information is not accurate, up to date, complete or relevant, or you wish to request that we provide you with Personal Information we hold about you, please contact our Privacy Officer on:

Email: [info@ninness.co.nz](mailto:info@ninness.co.nz) "Attn: Privacy Officer"

Phone: (04) 237 4174

Mail: 17 Kenepuru Drive, Porirua 5022

## **8 Mandatory Reporting**

- 8.1 If your Personal Information is involved in a privacy breach which we reasonably believe is notifiable or must be reported in accordance with the Privacy Act (“**Notifiable Privacy Breach**”), we will inform the affected individual/s and report the Notifiable Privacy Breach to the New Zealand Office of the Privacy Commissioner, in accordance with our obligations under the Privacy Act.

## **9 Changes to the Privacy Policy**

- 9.1 We may update this Privacy Policy from time to time. We will notify you of any such updates by publishing the updated Privacy Policy on our Website. The revised Privacy Policy will apply from the date that we upload it to the Website.
- 9.2 We encourage you to review this Privacy Policy on our Website periodically to stay informed about how we are helping to protect your Personal Information. Your continued use of the Website, and our goods and services, constitutes your agreement to this Privacy Policy as updated.

## **10 Contact and Complaints**

- 10.1 Please contact us at [info@ninness.co.nz](mailto:info@ninness.co.nz) “Attn: Privacy Officer” if you have any questions, concerns or complaints in relation to this Privacy Policy or the protection of your Personal Information. Our Privacy Officer will investigate and respond to any complaints or concerns as soon as possible and in accordance with the time frames and procedures set out in the Privacy Act.
- 10.2 If you are not satisfied with how we have handled your complaint, you can complain to the [Office of the Privacy Commissioner](#).