Bald Angels Charitable Trust
Ngā Anahera Pakira

Privacy Policy

Date policy approved: 21/07/22
Reviewed: July 2024
Reviewed: August 2026
Next due date for review: June 2029

1. Introduction

Mission:
Creating positive change for our tamariki and rangatahi by leading and facilitating community collaboration.

Values Statement
We will value and respect all people, guided by Te Whare Tapa Wha principles of wellness. The physical, mental, spiritual and social health of our tamariki and rangatahi will be our primary focus. We will lead by example.
All children deserve to thrive. Together we can make a difference.
Na ta rourou, nga taku rourou, ka ora nga tamariki, katoa.

2. Statement of Commitment

This policy fulfils Bald Angels Charitable Trust's ("Bald Angels") duty and responsibility as required by the Privacy Act 2020.

Bald Angels is incorporated as a charitable trust and registered as a charitable entity (CC50983), and its related entities are totally committed to protecting personal information.

2.1. Objective of this policy:

2.1.1. In accordance with the Privacy Act 2020 and the Privacy Amendment Act 2025, and the mission statement of Bald Angels, this policy aims to maintain high standards for the protection of data to ensure that information remains private and is only used for the purpose it was collected.

3. Related documents

3.1. This policy should be read and used with the following other policies:

3.1.1. Vulnerable people policy

3.1.2. Cultural competency policy

3.1.3. Dispute resolution policy

3.1.4. Volunteer policy and Induction handbook

3.1.5. Health and safety policy

4. Legislation

4.1. This policy complies with the following legislation:

4.1.1. Privacy Act 2020 (NZ)and the Privacy Amendment Act 2025,

4.1.2. Human Rights Act 1993

4.1.3. Children's Act 2014 (formerly the Vulnerable Children Act)

4.1.4. Health and Safety at Work Act 2015

4.1.5. The Donor Bill of Rights from the Association of Fundraising Professionals

4.1.6. Charities legislation

4.1.7. Working with children legislation

4.1.8. Employment Law legislation

5. Scope

5.1. This policy applies to all Trustees and staff/volunteers.

5.2. Those impacted by this policy are also every person who interacts with or is a donor of Bald Angels.

6. Definitions

6.1. *'Personal information'* is any information or opinion that can identify or be used to identify an individual person.

6.2. *'Staff'* means any person who is employed directly by is volunteer volunteering for Bald Angels, and staff and volunteers of partner organisations whilst they are working on Bald Angels projects or programmes.

6.3. '*Donor*' means a person or entity that gives, donates or presents something to the Trust.

7. Responsibilities of the Trust Board

7.1. Bald Angels is incorporated as a charitable trust and registered as a charitable entity (CC50983), and its related entities are totally committed to protecting personal information. Please read this statement carefully as it describes how we handle your personal information.

7.2. The Trust Board of Bald Angels is responsible for:

7.2.1. Identifying, designing, implementing, and regularly reviewing this policy.

7.2.2. Ensuring this policy is complied with in all Bald Angels projects and programmes.

7.2.3. Providing guidance to staff about how to comply with this policy.

8. Review

8.1 This policy, and any sub-policies, related policies and procedures will be reviewed every three years or sooner if required

9 The Privacy Officer

9.1 The Privacy Officer is the CE, who is tasked with reviewing the privacy statement, providing regular updates, and training to staff, investigating complaints related to privacy and acting as the liaison with the Office of the Privacy Commissioner when required. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at admin@baldangels.org.nz.

9.2 A register of privacy related issues is held by the admin officer who will also determine if notification to the Office of the Privacy Commissioner is required.

10 Bald Angels Charitable Trust ("Bald Angels") Privacy Statement

10.1 In accordance with the Privacy Act 2020 and the Privacy Amendment Act 2025, the Bald Angels Privacy Policy covers the method, use and storage of personal information of both staff and clients. The full privacy statement is available on the Bald Angels website: www.baldangels.org.nz Resources can also be found on the website for the Privacy Commissioner: https://www.privacy.org.nz/ .

11 Collection of personal information

11.1 We collect personal information from you, including information about your:

11.1.1 Name

11.1.2 Contact information

11.1.3 Computer or network

11.1.4 Billing or purchase information

11.2 We collect your personal information to carry out actions directly related to our business.

11.3 In accordance with the New Zealand Privacy Act 2020, and the Privacy Amendment Act 2025, we maintain high standards for the protection of data to ensure that information remains private and is only used for the purpose it was collected.

11.4 You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong.

12 What personal information we collect

12.1 'Personal information' is any information or opinion that can identify or be used to identify an individual person. We collect and hold personal information from our donors, supporters, volunteers, contractors, visitors, and other individuals. For example, for a donor, we would collect and hold their name, address, e-mail address, phone number. From time to time, we may collect more detailed personal information, such as when we conduct surveys, but provision of more detailed information is purely voluntary.

12.2 We only collect identifying information if it is necessary. If we don't really need identifying information, such as a person's name or their contact details, we won't collect it. Our goal is to collect and use the least amount of information possible to meet our objectives.

13 How we collect personal information

13.1 Most of the time, we collect personal information directly from individuals at the time they deal with us. For example when a person donates, sends us an email, or uses our website. From time to time we may obtain personal information from third parties.

When we do so, we will take reasonable steps to ensure that we make the person the information is about aware of the collection of the information in accordance with New Zealand privacy law.

13.2 Personal information may also be collected by us when a person speaks to someone at Bald Angels or sends us information via email or postal mail. In those circumstances we only collect the information when the person gives it to us voluntarily. We use this information to ensure we satisfy the person's reason for contacting us.

13.3 We collect information about our supporters and website users, including:

13.3.1 Personal information provided voluntarily when registering and completing forms

13.3.2 Website usage information through tracking individual click behaviour (page views, time on site, how a person got to the site etc.) to understand how we can make people's experience on our website better.

13.3.3 Aggregated website traffic information collected by our web server or third-party systems we subscribe to.

13.4 We take extra care in collecting information from children or young people to ensure the way we collect the information is fair in the circumstances. It may not be fair to collect information from children in the same manner as we do from an adult.

14 Use of personal information

14.1 We use personal information primarily to:

14.1.1 Process donations accurately.

14.1.2 Communicate with donors on matters relevant to donations (e.g. from time to time provide them with information about us that may be of interest).

14.1.3 Improving our website so we can give people a better online experience.

14.1.4 Providing people with any other services they have requested.

14.1.5 Using the information for any other purpose for which the person gives us permission.

14.1.6 Report to funders and create promotional material by using any photographs taken during projects, events, and campaigns.

14.2 Where relevant personal information is not provided, we may not be able to carry out these activities and functions in relation to particular individuals.

15 Disclosure of personal information

15.1 As required by the Privacy Act 2020, we follow strict security procedures in the storage and disclosure of your personal information. These security procedures mean that we may occasionally request proof of identity before we are able to disclose sensitive information to you.

15.2 This Statement is regularly reviewed and if necessary updated to meet legal requirements for privacy. We may revise this Privacy Statement by publishing a revised version on our website. That revised version takes effect from the time it is published.

15.3 We generally do not disclose personal information to other organisations unless we believe it is reasonably necessary to conduct the functions and activities of Bald Angels, if a person gives consent or if it is required or authorised by law including in emergency situations or to assist law enforcement.

15.4 We use a range of suppliers, service providers, contractors, and partners to enable the activities and functions of Bald Angels. They include information technology service providers, direct marketing agencies, banks, credit card companies' agencies. This means that organisations, and individuals other than us may collect, access, and use personal information held by us. We require these third-party providers through our agreements with them to comply with our security guidelines and privacy laws.

16 Security of personal information

16.1 We take all reasonable steps to ensure the security of personal information by storing it in a secure environment. If contract service providers are used, they will be bound by our Confidentiality Policy. We require our employees, contractors, volunteers, and third-party service providers to respect and protect the confidentiality of personal information we hold.

16.2 Our electronic database is secured by a firewall to ensure, so far as practicable, that it is not accessed by unauthorised parties. Our website has security measures designed to protect against the loss, misuse and/or alteration to your personal information under our control. Secure pages on our website are protected by an SSL certificate. A security icon visible on the screen, for example a padlock, to confirm a browser supports SSL security. However, all unencrypted information exchanged via the internet may be accessed and used by people other than those for whom it is

intended, for example any personal information sent by email it is sent at the sender's own risk.

17 Access to, correction of and deletion of personal information

17.1 A person may, at any time, request access to, correction of or deletion of any personal information about them held by us.

18 Communications from us

18.1 We use personal information to send direct marketing messages or telemarketing if we feel it is appropriate to the nature of a person's relationship with us, e.g., if a person donated to an appeal, they would receive information about future appeals.

18.2 To avoid sending communications that people do not want to receive, any electronic communication we send (either by email or text), except for messages confirming a transaction with us, will always have an unsubscribe facility.

18.3 Any person may, at any time, inform us they do not want to receive communications of any kind from us, by emailing contact us. Such requests may take up to seven days to process.

18.4 We do not sell personal information to third parties and, except as provided for in this policy we do not make personal information available to third parties.

19 Use of email or mobile numbers for communications

19.1 By default, a visitor/donor to our website is:

19.1.1 Opted-in to our email newsletter distributed periodically.

19.1.2 Opted-in to our service announcements.

19.1.3 Opted-in to receive survey invitations to help us improve our service to you.

19.2 An 'opt out' check box is provided for people who do not want to receive these types of communications.

20 Dealing with us anonymously

20.1 A person may request us to deal with them anonymously or through a pseudonym. We will accommodate this request if it is lawful and practical for us to do so. For example, it may not be possible for us to process a donation or for someone to volunteer if they do not provide the necessary personal information.

21 Website tracking and online advertising

21.1 We use third party website trackers, such as Google Analytics to collect information on how people use our website. On occasion, random short surveys may also be used to collect further information about our users — participation in these surveys will be entirely voluntary.

22 Cookies

22.1 When people use our website, we may collect personal information from them automatically through cookies including: their IP address and or domain name, operating system (type of browser and platform), and the date, time and length of the visit to the website. We use this information primarily for the compilation of statistical information about the use of our website. Most web browsers are set by default to accept cookies. However, a person may set their browser to either prompt them to refuse cookies or automatically refuse cookies.

23 Google Analytics

23.1 We use services such as Google Analytics, which will issue cookies from their own servers, and which will be able to track website visitors throughout our website and through any other sites that use those services.

23.2 The services are used to aggregate website statistics anonymously, such as number of page views, the number of unique visitors, time spent on our site, and to determine advertising effectiveness.

23.3 Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so they can improve it. Google

Analytics collects information anonymously. It reports website trends without identifying individual visitors. All website owners using Google Analytics are required to have a privacy policy that fully discloses the use of Google Analytics. We use this information to track the effectiveness of our website. Types of data collected include visits, viewed pages and the technical capabilities of our visitors. These statistics will not identify you as an individual. For more information read Google's Privacy Policy.

24 Online advertising

24.1 We may use third party vendors, such as Google, to display advertising on websites across the internet.

24.2 These third-party vendors may also use cookies to anonymously track, and target advertising based on browsing behaviour.

24.3 For further information and details of how to opt out of these third-party cookies via the Network Advertising Initiative, click here.

25 Social Media

Bald Angels supports the use of social media as a way of facilitating communication and dialogue between its various audiences.

Any entry on Social Media that refers to Bald Angels must be approved by Bald Angels. Staff and volunteers must always be alert to the fact that postings on social media sites can be immediate, public and permanent.

Definitions
Social media means a dialogue allowing people to socially interact with one another online; some examples of social media sites and applications include Facebook, YouTube, Twitter, blogs and other sites that have content based on user-participation and user-generated content.

Personal social media involvement
A staff member using a social media site as a private individual:

a. Must not post confidential information about Bald Angels, its staff (including former staff), volunteers (including former volunteers), donors and / or clients.

b. When posting about Bald Angels, staff must do so in a professional manner and must always consider how the post may reflect on the firm; this is particularly relevant when the subject matter is controversial.
c. Must consider the privacy of co-workers and volunteers, and must not post photos, videos, or details of internal conversations that may identify them without their permission.
d. Must not use the Bald Angels logo on personal social media pages without prior permission.
e. Must not use the Bald Angels name or logo to promote a product, cause, political party, or national or local government candidate.
f. Must ensure that any information posted about Bald Angels is factually correct

Please note: all references to Bald Angels requires prior approval.

26 Links to other websites

26.1 Bald Angels website may contain links to third party websites, and third-party websites may also have links to our website. Our Privacy Policy does not apply to external links or other websites. These third-party websites may collect personal information. We encourage people to read the privacy policies of any website they link to from our website.

27 Security of online donations and transactions

27.1 Donations made online on our Bald Angels website are processed in real time using a secure payment gateway provided by PayPal. Donations are processed in New Zealand (and for all other countries) in New Zealand Dollars. For any questions or concerns about making an online donation to Bald Angels please contact us.

27.2 Our website has layers of security to protect it against malicious activity, possible breaches of the system ('cracking') and unauthorised access to customer data. Personal information is not permanently stored on our website.

27.3 When a person sends us an email, it is not encrypted and is therefore not secure.

28 Credit and debit card security

28.1 We work diligently to protect the security of personal cardholder information, including credit and debit card information. People can protect themselves against unauthorised access to their information and computer by ensuring they logout when finished, especially if using a shared computer.

28.2 Personal cardholder data sent to us by email or by postal mail or over the phone, is dealt with in accordance with the Payment Card Industry Security Standard Council's payment card industry data security standards and only store cardholder data in a secure encrypted environment.

29 Job applicants

29.1 When we receive an application for employment personal information that was included in the application may be collected, such as contact details, career history, education details, eligibility to work in New Zealand, written references, and other career-related information. This may also include sensitive information, such as medical information or criminal history.

29.2 The following personal information may also be obtained from third parties:

29.2.1 Personal information through a recruitment service provider.

29.2.2 Prior employment history from previous employers or nominated referees.

29.2.3 Criminal record history, by way of a criminal history check.

29.2.4 Eligibility to work in New Zealand, by way of a visa status check.

29.2.5 Educational qualifications, by way of requesting confirmation of qualifications or results from an academic institution.

29.3 If personal information is obtained from third parties, reasonable and practicable steps will be taken at or before the time of collection (or as soon as practicable after collection) to notify an individual, or otherwise to ensure awareness of the collection of personal information.

29.4 Personal information may be collected during the recruitment process for the purpose of assessing and progressing an application, inviting applicants to apply for future positions of interest at Bald Angels and conducting statistical reporting and analysis in relation to the recruitment processes. Personal information for future job opportunities may be held, unless specifically requested to be deleted.

29.5 By applying for a job and providing personal information, an individual is providing consent to collect personal information, use and disclose it for the purposes set out in this policy. This may include disclosing personal information to referees and to other third parties that we use to help with the recruitment process. Personal information may also be disclosed to law enforcement agencies to verify whether an individual has a criminal record.

30 Staff and induction

30.1 All staff inductions are to reference online training course "Privacy ABC", hosted by the Privacy Commissioner at: https://elearning.privacy.org.nz/.

30.2 The following updates for staff will be regularly be issued:

30.2.1 Who the Privacy Officer is.

30.2.2 The need for security for client information.

30.2.3 Warnings against voyeurism or browsing.

30.2.4 Conversations in public places and disclosing information to those close to you.

30.2.5 Actions to take following a suspected privacy breach.

30.2.6 General physical storage best practice.

30.2.7 Requests for additional privacy considerations from a client.

30.2.8 Scanning – clear the machine following each scan.

31 Complaints

31.1 The admin officer is responsible for investigating any complaints or concerns any person may have about our protection of their privacy. If we become aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns.

31.2 There are no fees for lodging a complaint. If a person wants to make a complaint about how we handle their personal information, they can contact our Privacy Officer at admin@baldangels.org.nz or by emailing admin@baldangels.org.nz OR office phone 021 029 01929 and ask for the Privacy Officer. The person should provide as much detail about the facts surrounding the complaint as possible so we can resolve it accordingly and allow us at least seven (7) days to respond to the complaint. If we fail to resolve a complaint, a person may refer the matter to the New Zealand Privacy Commissioner.

31.3 If you have feedback or complaints on any other matter please contact us at admin@baldangels.org.nz

31.4 In relation to any breaches of the privacy policy, the policy is to be read in conjunction with other BACT policies, and in particular the BACT employment/volunteer policy and with the BACT code of conduct. All breaches are to be reported to the Privacy Officer who will address the complaint with the BACT board at their periodic meetings.

33. PCI DSS Compliant

33.1 We are PCI DSS compliant:

The PCI DSS (Payment Card Industry Data Security Standard) is a set of security standards designed to ensure that companies that accept, process, store or transmit credit card information maintain a secure environment.

Bald Angels is compliant against version 3.2.1 of the PCI Data Security Standards, endorsed by Visa, MasterCard, American Express, and all other leading card brands.

34. Donor Policy

Our Commitment to Our Donors

34.1 We will not sell, share or trade our donors' names or personal information with any other entity, nor send mailings to our donors on behalf of other organisations.

34.2 This policy applies to all information received by Bald Angels both online and offline, on any Platform ('Platform', includes the Bald Angels website and mobile applications), as well as any electronic, written, or oral communications.

34.3 To the extent any donations are processed through a third-party service provider, our donors' information will only be used for purposes necessary to process the donation.

35. The Donor Bill of Rights

35.1 Bald Angels is committed to upholding the Donor Bill of Rights

35.2 Philanthropy is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To assure that philanthropy merits the respect and trust of the public, and those donors and prospective donors can have full confidence in the not-for-profit organisations and causes they are asked to support, we declare that all donors have these rights:

35.2.1 To be informed of our mission, the way we intend to use donated resources, and its capacity to use donations effectively for their intended purposes.

35.2.2 To be informed of the identity of those serving on Bald Angels governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities.

35.2.3 To have access to Bald Angels most recent financial statements.

35.2.4 To be assured their gifts will be used for the purposes for which they were given.

35.2.5 To receive appropriate acknowledgment and recognition.

35.2.6 To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by law.

35.2.7 To expect that all relationships with individuals representing organisations of interest to the donor will be professional in nature.

35.2.8 To be informed whether those seeking donations are volunteers, employees of the organisation or hired solicitors.

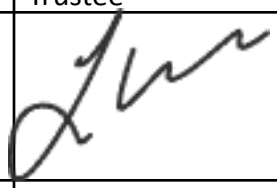
35.2.9 To have the opportunity for their names to be deleted from mailing lists that an organisation may intend to share.

35.2.10 To feel free to ask questions when donating and to receive prompt, truthful and forthright answers.

Mission Statement

BALD ANGELS

Creating positive change for our tamariki(children) and rangatahi (young people) by leading and facilitating community collaboration.

Date reviewed	5 August 2026
Name	Thérèse Wickbom
Title	Trustee
Signature	
Date reviewed	5 August 2026
Name	Irenee Cooper
Title	Trustee
Signature	