Privacy Policy

Ingenio Homes Limited

Policy owner: Ingenio Homes Limited Policy
approved by: the Directors
Policy reviewed and approved: 01/09/2026
Next review due: 01/09/2027

Introduction

Ingenio Homes Limited (IH) is committed to protecting your privacy and any personal information in relation to your use of our products and services, and as such, fully complies with the New Zealand Privacy Act 2020.
This Privacy Policy applies to our web site and governs all forms of Personal Information and related data collection and usage by us.
IH are governed by New Zealand's Privacy Principles (NZPP'S) contained in the Privacy Act 2020. For ease of reference, the Principles are featured at the end of this Policy. IH ensures that all its staff members adhere to the NZPP's to safeguard your Personal Information.
IH have also adopted the EU General Data Protection Regulation (GDPR) guidelines covering data protection for all businesses transferring data to the European Union.
By using our website, or otherwise supplying your personal information to us, you consent to the data practices described in this Privacy Policy. This Privacy Policy also needs to be read in conjunction with our web site terms of use, as displayed on our website.
IH may review and update this Privacy Policy on occasion, (for example to reflect changes to the Privacy Act), any revision or update will be published on the IH web site.
This Privacy Policy does not seek to limit or exclude the individual rights of any individual, as prescribed under the Privacy Act 2020, which can be accessed at www.nzbt.co.nz/resources

What is Personal Information? Why do we collect it?

Personal Information is information or an opinion that identifies an individual personally. Most of the Personal Information that IH may collect about you, will be voluntarily provided by you, or your authorised representative, when you engage with us, to allows us to operate our wider operations and to deliver the products and services that you have requested.
Examples of Personal Information we collect may include;

- An individual's name (including that of your authorised representative, if applicable),
- An individual's contact details, including your residential and work addresses, email addresses, phone and facsimile numbers.
- Publicly available information relating to you.
- Any documents or other information that you provide to us as part of our provision of services.

This Personal Information can be captured in many ways including (interviews, correspondence, by telephone, by email, via our website ingeniohomes.co.nz, from your website, from media and publications, from other publicly available sources, from cookies, and from third parties.

Disclosure

IH will only disclose your information as authorised by you, as required by law or where required for us to provide our services. IH will not, share, sell, rent or lease any client list or information to third parties. IH may also disclose Personal Information to other agencies where it believes on reasonable grounds that it falls within one of the exceptions to NZPP 11

Security

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss from unauthorised access, modification or disclosure.
IH may hold your Personal Information in either an electronic or hard copy form.
Personal information collected in hard copy form may be subsequently converted to electronic form. Hard copy information that remains as such, will be securely stored at IH's premises.
Personal information held or provided to us in electronic form is held on servers controlled by third parties under contractual arrangements with IH uses a combination of physical security, password

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd

protection and other measures that ensure that Personal Information stored in electronic form is protected from misuse, interference and loss: and from unauthorised access, modification and disclosure. However, it is not possible for any organisation (including ours), to state that 100% security can be guaranteed.

Retention

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files (electronic or hard copy) which will be securely retained by us for a minimum of 7 years.

Access

You have the right to request a copy of the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions, if you think it is incorrect.

If you wish to access your Personal Information, please submit your request to IH's Privacy Officer (please see Privacy Policy Complaints and Enquiries) in writing. IH will acknowledge your request as soon as possible, and will respond to the request no later than 20 working days after we receive your request (unless extended under the Privacy Act 2020.)

IH will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In respect of a request for correction, if we think the correction is reasonable, justified and we are reasonably able to amend the Personal Information, we will make the correction.

In order to protect your Personal Information, we will require identification and if relevant, proof of authorisation from you before releasing the requested information.

Third Parties

Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances we may be provided with information by third parties.

This information may relate to an individual's;

- Criminal History; or
- Credit History; or

Where IH enters into arrangements with associated contractors and third parties that involve the use or management of Personal Information that is held by IH, appropriate provisions will be included to protect that Personal Information.

Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. IH will take reasonable steps to make sure that your Personal Information is accurate, and this may require individuals being contacted directly.

Use of Cookies

The IH web site uses cookies. A cookie is a small element of data that our web site may send to your computer. A cookie is typically stored on your computer's hard drive and permits our web site to recognise you when you return, to our web site. Our use of cookies helps us to provide you with a better experience during your use of our web site by allowing us to understand what areas of the site are of interest to you. You may configure your web browser to not accept cookies, although you may experience a loss of functionality as a result of this action.

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd

Role of the Privacy Officer

IH have appointed a Privacy Officer in accordance with the requirements of the Privacy Act 2020. As part of their role, the IH Privacy Officer needs to ensure that IH's internal policies and procedures are fully compliant with requirements under the Privacy Act 2020, NZPP and GDPR. The IH Privacy Officer will ensure that all IH staff and associated contractors understand their commitments under the Privacy Act, NZPP's and the GDPR.

The IH Privacy officer is the focal point for all privacy matters relating to IH business. This contact may be from IH Clients, IH staff or associated contractors, or the Privacy Commission/Commissioner. IH's Privacy Officer is also responsible for ensuring this Privacy Policy is reviewed regularly and maintains IH's compliance to the most up-to-date version of the Privacy Act, NZPP's and the GDPR.

Privacy Policy Complaints and Enquiries

IH want to know if you have any concerns about our privacy practices., whether these relate to the way we collect or share information about you or our decision on your access request. If you do have any concerns at all, please contact our Privacy Officer and they will endeavour to resolve any issues. The IH Privacy Officer's contact details are recorded below.

Privacy Officer
Name: Kristyna Ellis
Mobile: 02108609062
Email: office@ingeniohomes.co.nz

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd

Privacy Principles

Principle 1

Purpose of collection of personal information

Personal information shall not be collected by any agency unless.

(a)The information is collected for a lawful purpose connected with a function or activity of the agency.

(b)The collection of the information is necessary for that purpose.

Principle 2

Source of personal information

(1) Where an agency collects personal information, the agency shall collect the information directly from the individual concerned.

(2) It is not necessary for an agency to comply with sub clause 1 of this principle if the agency believes, on reasonable grounds,

(a) That the information is publicly available information, or

(b) That the individual concerned authorises collection of the information from someone else, or

(c) That non-compliance would not prejudice the interests of the individual concerned, or

(d) That non-compliance is necessary-

(i) To avoid prejudice to the maintenance of the law by any public sector, including prevention, detection, investigation, prosecution, and punishment of offences, or

(ii) For the enforcement of a law imposing a pecuniary penalty, or

(iii) For the protection of public revenue, or

(iv)For the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation), or

(e) That compliance would prejudice the purposes of the collection, or

(f) That compliance is not reasonably practicable in the circumstances of the case, or

(g) That the information

(i) Will not be used in a form in which the individual concerned is identified, or

(ii) Will be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned, or

(h) That the collection of the information is in accordance with the authority granted under section 54 of this Act.

Principle 3

Collection of information from subject

(1) Where an agency collects personal information from the individual concerned, the agency shall take such steps (if any) as are, in circumstances, reasonable to ensure that the individual concerned is aware of,

(a) The fact that the information is being collected, and

(b) The purpose for which the information is being collected, and

(c) The intended recipients of the information, and

(d) The name and address of,

(i) The agency that is collecting the information, and

(ii) The agency that will hold the information, and

(e) If the collection of the information is authorised or required by or under law,

(i) The law by or under which the collection of the information is so authorised or required and

(ii) Whether or not the supply of the information of the information by that individual or voluntary or mandatory, and

(f) The consequences (if any) for that individual if all or any part of the requested information is not provided, and

(g) The rights of access to, and correction of personal information provided by these principles.

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd

(2) The steps referred to in sub clause (1) of this principle shall be taken before the information is collected or, if that is not practicable, as soon as practicable after the information is collected.

(3) An agency is not required to take the steps referred to in sub clause (1) of this principle in relation to the collection of information from an individual if that agency has taken those steps in relation to the collection, from that individual, of the same information or information of the same kind, on a recent previous occasion.

(4) It is not necessary for an agency to comply with sub clause (1) of this principle if the agency believes, on reasonable grounds

(a) That non-compliance is authorised by the individual concerned, or

(b) That non-compliance would not prejudice the interests of the individual concerned, or

(c) That non-compliance is necessary

(i) To avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution, and punishment of offences, or

(ii) For the enforcement of a law imposing a pecuniary, or

(iii) For the protection of the public revenue, or

(iv) For the conduct of proceedings before any court or tribunal being that proceedings that have been commenced or are reasonably in contemplation, or

(d) That compliance would prejudice the purpose of the collection, or

(e) That compliance is not reasonably practicable in the circumstances of the case, or

(f) That the information

(i) Will not be used in a form in which the individual concerned is identified, or

(ii) Will be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned.

Principle 4

Manner of collection of personal information Personal information shall not be collected by an agency-

(a) By unlawful means, or

(b) By means that, in the circumstances of the case

(i) Are unfair, or

(ii) Intrude to an unreasonable extent upon the personal affairs of the individual concerned,

Principle 5

Storage and security of personal information

An agency that hosts personal information shall ensure,

(a) That the information is protected by such security safeguards as if is reasonable in the circumstances to take against,

(i) Lost, and

(ii) Access, use, modification or disclosure, except with the authority of the agency that holds the information, and

(iii) Other misuse, and

(b) That if it is necessary for the information to be given to a person in connection with the provision of a service to the agency, everything reasonably within the power of the agency is done to prevent unauthorised use or unauthorised disclosure of the information.

Principle 6

Access to personal information

(1) Where an agency holds personal information in such a way that it can be readily retrieved the individual concerned shall be entitled-

(a) To obtain from the agency confirmation of whether the agency holds such personal information, and

(b) To have access to that information.

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd

(2) Where, in accordance with sub clause (1)(b) of this principle, an individual is given access to personal information, the individual shall be advised that, under principle 7, the individual may request the correction of that information.
(3) The application of this principle is subject to the provisions of parts iv and v of this Act.

Principle 7

Correction of personal information.

(1) Where an agency holds personal information, the individual concerned shall be entitled
  (a) To request correction of the information, and
  (b) To request that there be attached to the information a statement of the correction sought but not made.
(2) An agency that holds personal information shall, if so requested by the individual concerned or on its own initiative, take such steps (if any) to correct that information as are, in the circumstances, reasonable to ensure that, having regard to the purposes for which the information may lawfully be used, the information is accurate, up to date, complete, and not misleading.
(3) Where an agency that holds personal information is not willing to correct that information in accordance with a request by the individual concerned, the agency shall, if so requested by the individual concerned take such steps (if any) as are reasonable in the circumstances to attach information, in such a manner that it will always be read with the information, any statement provided by that individual of the correction sought.
(4) Where the agency has taken steps under sub clause (2) or sub clause (3) of this principle, the agency shall, if reasonably practicable, inform each person or body or agency to whom the personal information has been disclosed of these steps.
(5) Where an agency receives a request made pursuant to sub clause (1) of this principle, the agency shall inform the individual concerned of the action taken as a result of the request.

Principle 8

Accuracy etc, of personal information to be checked before use

An agency that holds information shall not use that information without taking such steps (if any) as are, in the circumstances, reasonable to ensure that, having regard to the purpose for which the information is proposed to be used, the information is accurate up to date, complete, relevant and not misleading.

Principle 9

An agency that holds personal information shall not keep that information for longer than is required for the purposes for which the information may be lawfully used.

Principle 10

Limits on use of personal information

An agency that holds personal information that was obtained in connection with one purpose shall not use the information for any other purpose unless the agency believes on reasonable grounds-

(a) That the source of the information is a publicly available publication, or
(b) That the use of the information for that other purpose is authorised by the individual concerned, or
(c) That non-compliance is necessary
  (i) To avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution, and punishment of offences, or
  (ii) For the enforcement of a law imposing a pecuniary penalty, or
  (iii) For the protection of the public revenue, or
  (iv) For the conduct of proceedings before any Court or Tribunal (being proceedings that have been commenced or are reasonably in contemplation) or
(d) That the use of the information for that other purpose is necessary to prevent or lessen a serious and imminent threat to-
  (i) Public health or public safety, or

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd

(ii) The life or health of the individual concerned or another individual, or

(e) That the purpose for which the information is used directly related to the purpose in connection with which the information was obtained, or

(f) That the information, or
(i) Is used in a form in which the individual concerned is not identified, or
(ii) Is used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned, or

(g) That the use of the information is in accordance with an authority granted under section 54 of this Act.

Principle 11

Limits on disclosure of personal information

An agency that holds personal information shall not disclose the information to a person or body or agency unless the agency believes, or reasonable grounds-

(a) That the disclosure of the information is one of the purposes in connection with which the information was obtained or is directly related to the purpose in connection with which the information was obtained, or

(b) That the source of the information is a publicly available publication, or

(c) That the disclosure is to the individual concerned, or

(d) That the disclosure is authorised by the individual concerned, or

(e) That non-compliance is necessary-
(i) To avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, investigation, prosecution, and punishment of offences, or
(ii) For the enforcement of the law imposing a pecuniary penalty, or
(iii) For the protection of public revenue, or
(iv) For the conduct of proceedings before any Court or Tribunal (being proceedings that have been commencement or are reasonably in contemplation), or

(f) That the disclosure of the information is necessary to prevent or lessen a serious and imminent threat to-
(i) Public health or public safety, or
(ii) The life or health of the individual concerned or another individual, or

(g) That the disclosure of the information is necessary to facilitate the sale or other disposition of a business as a going concern, or

(h) That the information-
(i) Is to be used in a form in which the individual concerned is not identified, or
(ii) Is to be used for statistical or research purposes and will not be published in a form that could reasonably be expected to identify the individual concerned, or

(i) That the disclosure of the information is in accordance with an authority granted under section 54 of this Act.

Principle 12

Disclosure of Personal Information outside of New Zealand

(1) An agency (A) may disclose Personal Information to a foreign person or entity (B) in reliance on IPP 11 (a), (c), (e), (f), (h), or (i) if;
(a) The individual concerned authorises the disclosure to B after being expressly informed by A that B may not be required to protect the information in a way that, overall, provides comparable safeguards to those in this Act; or
(b) B is carrying on business in New Zealand and, in relation to the information, A believes on reasonable grounds that B is subject to this Act; or

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd

(c) A believes on reasonable grounds that B is subject to privacy laws that, overall, provide comparable safeguards to those in this Act; or
(d) A believes on reasonable grounds that B is a participant in a prescribed binding scheme; or
(e) A believes on reasonable grounds that B is subject to privacy laws of a prescribed country; or
(f) A otherwise believes on reasonable grounds that B is required to protect the information in a way that, overall, provides comparable safeguards to those in this Act (for example, pursuant to an agreement entered into between A and B.)

(2) However, subclause (1) does not apply if the personal information is to be disclosed to B in reliance on IPP 11 (e) or (f) and it is not reasonably practicable in the circumstances for A to comply with the requirements of subclause (1).
(3) In this IPP; "prescribed binding scheme" means a binding scheme specified in regulations under section 213 and "prescribed country" means a country specified in regulations made under section 214.

Principle 13

Unique identifiers

(1) An agency shall not assign a unique identifier to an individual unless the assignment of that identifier is necessary to enable the agency to carry out any one or more of its functions efficiently.
(2) An agency shall not assign to an individual a unique identifier that, to that agency's knowledge, has been assigned to that individually by another agency, unless those two agencies are associated persona within the meaning of section 8 of the Income Tax Act 1976
(3) An agency that assigns unique identifiers to individuals shall take all reasonable steps to ensure that unique identifiers are assigned only to individuals whose identity is clearly established.
(4) An agency shall not require an individual to disclose any unique identifier assigned to that individual unless the disclosure is for one of the purposes in connection with which that unique identifier was assigned or for a purpose that is directly related to one of those purposes.

Protected by NZBT – Building Better Business
© Copyright New Zealand Business Tools Ltd