



## **Pause Breathe Smile Trust (“the Trust”)**

### **Privacy Policy**

#### **Purpose**

This privacy policy sets out how Pause Breathe Smile Trust collects, uses and protects personal information given by individuals and groups. Pause Breathe Smile Trust commit to only use personal information collected in accordance with this policy.

#### **Scope**

This policy applies to the Pause Breathe Smile Trust Board members and employees.

#### **Policy Statement**

The Pause Breathe Smile Trust is committed to ensuring our policies and processes for the collection, use, storage, security, and disposal of personal information, and the technology we use to support our processes, not only comply with all relevant legislation and statistical principles and protocols, but also meet stakeholder expectations, and are effectively implemented. For purposes of this Policy "confidential information" includes all non-public information relating to the Pause Breathe Smile Trust, its business, customers or suppliers.

#### **General:**

##### **What is considered personal information?**

When used in this policy, the term “personal information” means any information that can personally identify you or that you are reasonably identifiable from.

##### **How we collect information:**

We collect personal information, via online registrations, emails and by telephone that you have freely provided to us.

The places where we collect personal information are:

1. Through our website [pausebreathesmile.nz](https://pausebreathesmile.nz) in these ways:
  - Registering for Pause Breathe Smile PLD for your school
  - Subscribing to receive the Pause Breathe Smile E-Newsletter
  
2. Via our office in these ways:
  - Emailing an enquiry to anyone of our team members
  - Registering for Pause Breathe Smile PLD for your school

## **What personal information do we collect and hold?**

We may collect the following personal information about you

- Name
- Email address
- Year 0-8 School you are in direct contact with
- Your role within the school

## **Why do we collect personal information?**

The purpose for which we collect information about you is to enable us to;

- Provide you with information about Pause Breathe Smile Programme and PLD
- Register you for the Pause Breathe Smile PLD
- To identify your personal registration
- Provide you with Pause Breathe Smile online resources and any technical support for accessing your account that you may need
- To provide you with information about upcoming events and news including sending you our E-Newsletter
- To communicate with via email

## **What will we do with your personal information?**

- Pause Breathe Smile Trust will only use your personal information for the purpose it is collected.
- We will not share, sell, rent or disclose your personal information or disclose your information to any other individual or organisation unless
  1. you have agreed to this or
  2. information is being given to a Mindfulness Facilitator or organisers of your school's PLD in order that they may respond to the needs you may have with the Pause Breathe Smile Programme
  3. there are concerns for the wellbeing of yourself or others and sharing of the information will improve the safety or wellbeing of yourself or others.

## **Storing your information and Security**

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access

We do this by:

- including by means of firewalls, password access, secure servers
- storing this information at the Pause Breathe Smile Trust in secured and passworded systems: Multi Factor Authentication is enforced on all core systems

## **How can I access my personal information?**

You may request access to any personal information we hold about you at any time by contacting the Pause Breathe Smile I.T. Services Support at [support@pausebreathesmile.nz](mailto:support@pausebreathesmile.nz)

Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example by emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others. If that happens, we will give you written reasons for any refusal.

If you believe that the personal information, we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

We request that you keep your information as current as possible so that we may continue to improve our service to you.

You can ask to be removed from our subscription lists at any time

### **How do I make a complaint about a breach of privacy?**

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please contact our Chief Executive Officer: [natasha@pausebreathesmile.nz](mailto:natasha@pausebreathesmile.nz) and provide details of the incident so that we can investigate it.

Once a complaint is received, it will be passed to the Board of Trustees. From there, the Trust will endeavour to determine the nature of the breach and how it occurred.

If a notifiable breach is found, Under the Privacy Act 2020, Pause Breathe Smile Trust will notify the Privacy Commissioner and the affected individual(s) as soon as practicable after becoming aware of the notifiable privacy breach.

You can also make a complaint to the Office of the Privacy Commissioner

PO Box 10094, Wellington 6143.  
0800 803 909 (Monday – Friday, 10.00 am – 3.00 pm).

<https://www.privacy.org.nz/your-rights/how-to-complain/>

### **Extra information you should know about our website**

#### **Website analytics**

We analyse **non-identifiable** web traffic data to improve our services. We use Google analytics a paid third-party service to analyse the web traffic data for us. The Trust owns the data that is generated, and it will not be shared with any other party for any other purpose.

We may collect, hold, and use statistical information about visits to help us improve the site, for instance:

- An IP address
- The search terms used
- The **non-identifiable** statistics of the user e.g. age, day of the week, type of device used
- The pages accessed on our site and the links you clicked on
- The date and time you visited the site
- The referring site (if any) through which you clicked through to this site
- Your operating system (e.g. Windows XP, Mac OS X)
- The type of web browser you use (e.g. Internet Explorer, Mozilla Firefox)

The data collected is aggregated and is not personally identifiable. IP addresses are masked so that they cannot be used to identify individuals. Our web analytics will also respect any “do not track” setting you might have set on your browser.

These services may track your use of our website on those pages where their links are displayed. If you are logged in to those services (including any Google service) while using our site, their tracking will be associated with your profile with them.

These services have their own privacy policies which are independent of ours.

### **Links to other websites**

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website.

Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

You should exercise caution and look at the privacy statement applicable to the website in question.