

One step at a time: getting your privacy system sorted

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For Privacy Week

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Today, I will cover:

- What are the privacy requirements?
- Why do you need to have a privacy system?
- How I would go about setting up a system for my fake business that I made up. Grab a pen and paper or open a word doc in another screen and you can follow along with your own organisation in mind



The Information Privacy Principles



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Collecting Personal Information

IPP

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- 01 Only collect information you **need**

 - 02 Get it **directly** from the person where possible

 - 03 Be **open** about what you are going to do with it (when you collect it **directly**)

 - 03A Be **open** about what you are going to do with it (when you collect it **indirectly**)

 - 04 Be **fair** about how you collect it

Holding Personal Information

IPP

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|-----------|--|
| 05 | Keep the information secure |
| 06 | Let people access their own information |
| 07 | Correct the information if it's wrong |
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Using and Disclosing Personal Information

IPP

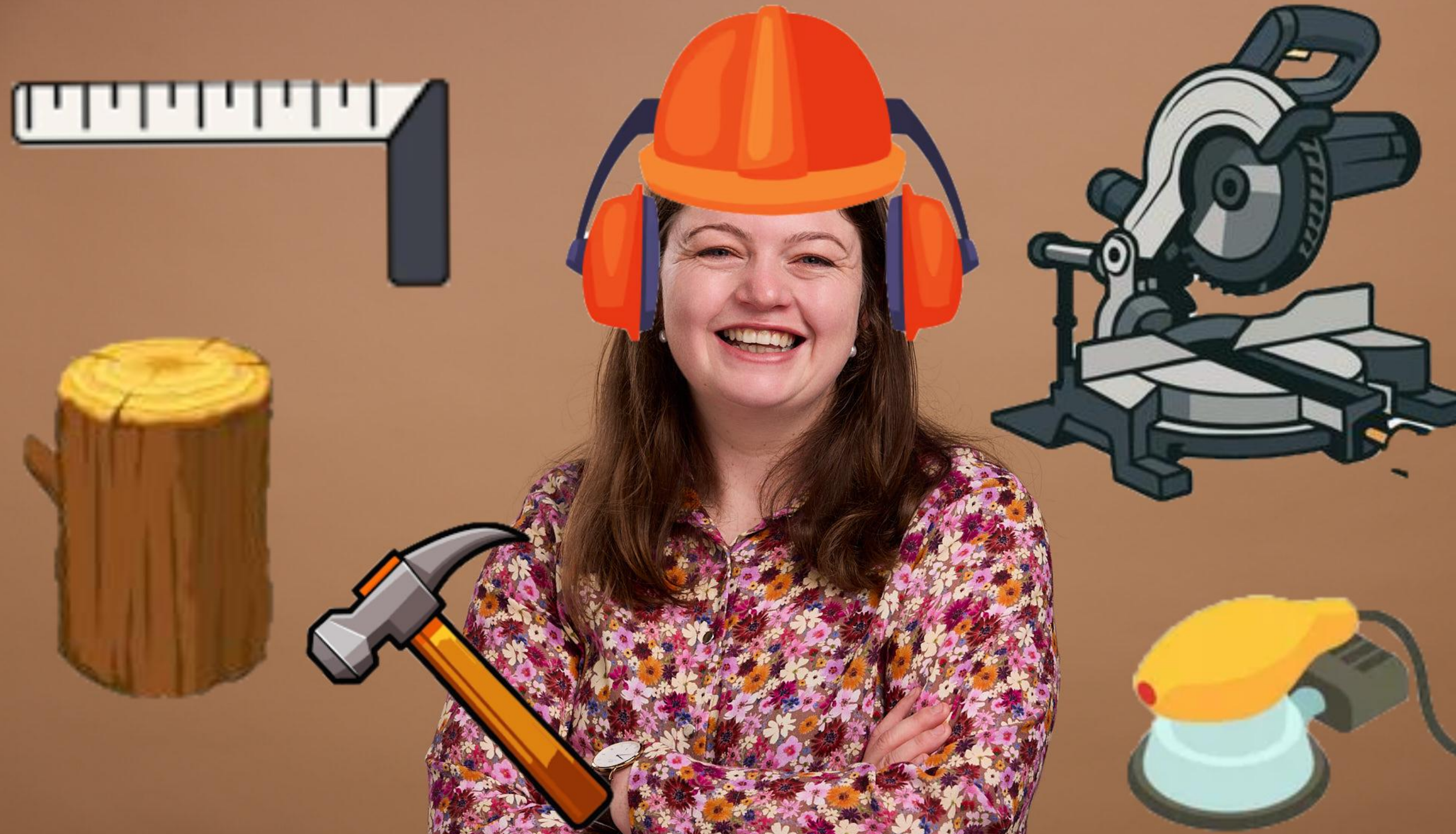
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- | | |
|-----------|---|
| 08 | Make sure it is accurate before using it |
| 09 | Only retain it for as long as you need it |
| 10 | Only use it for the reason it was collected |
| 11 | Only disclose it for the reason it was collected |
| 12 | Only send it overseas if it will be protected |
| 13 | Only use unique identifiers when permitted |
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Why do you need to have a privacy system?

- It's the law! You need to protect personal information
- It's easier if you do it methodically
- If you know what information you hold you know how to look after it
- This is a simplified version of a Privacy Management Plan – more info at <https://www.privacy.org.nz/responsibilities/poupou-matatapu-doing-privacy-well/privacy-management-plan/>



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GREGOR'S FINE FURNITURE

Step one: what does Gregor's Fine Furniture do?

- Make and sell wooden furniture
- Take orders for bespoke pieces of furniture
- Measure and quote for furniture building and installation

That is my **lawful function!** Next I have to figure out what personal information I need in order to do this.



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Step two: what personal information do I need to do my job?

- Name, email and phone number of purchasers
- Home address – installation
- Information about their tastes, budgets, notes about what they tell me during the building process
- Billing information



Step three: how do I collect this personal information?

- Directly from the person when they contact me. They can contact me via email, through a form on my website or by calling my cellphone number
- Sometimes I receive referrals from a kitchen designer who sends me the details of a person who wants a butcher's block



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Step four: what do I tell the person about the information I collect?

- If they contact me directly via a website form I link from there to my privacy statement
- I made my privacy statement using OPC's Priv-o-matic tool

<https://www.privacy.org.nz/privomatic/index.html>



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What to include in a privacy statement

- What info you collect
- Why you collect it
- Who you plan to share the information with
- Whether the information collection is mandatory
- That the individual has the right to ask for a copy of any information you hold about them, and how to do that



I put the info from steps 1-3 into Priv-o-matic and here's my privacy statement:

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

- name
- contact information
- location
- interactions with us
- billing or purchase information

We collect your personal information in order to:

- take your order for bespoke pieces of furniture
- deliver your order to you
- send you updates and marketing emails

Besides our staff, we share this information with:

- Follett Kitchens in order to arrange installation and discuss specifications of your requests.

Providing some information is optional. If you choose not to enter contact details, we'll be unable to provide them with any furniture.

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. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at my email address, or my phone number, or my postal address.

I then think about IPP3A – what do I need to add about indirect collection?

- I add the information I receive via referral from the kitchen designer into my privacy policy
- And then if I am sent a referral from the kitchen designer I send a link to my privacy policy to the new potential client at the time that I send them an email to start work

Step five: how do I look after information once I have it?

- I make a separate business email address to my personal one
- I save the information that people provide me into a separate folder on my laptop enable multi-factor authentication for my business email account and have a password on my computer
- I have a drawer in my workshop where I keep hard copy versions, and this drawer is locked



Step six: what if people want to access their own personal information?

- I make sure I have a process. Because I know what information I have it is easy to respond to a request.
- If a client asks for their information I can look in my email, in the folder on my computer and in my locked drawer for any personal information about them
- I then provide them with this information within 20 working days



Step seven: how long do I keep the information?

- I create a retention policy. I offer a warranty of two years on my furniture so I keep the information for at least that long. But I also want to retain it for longer because I know that repeat clients appreciate when I have a record of our previous interactions
- I also know I have to keep records for tax purposes for seven years. This is a lawful purpose, so I decide that I will keep the information for seven years before securely deleting it



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Other things I make sure I do

- I appoint a Privacy Officer – every agency has to have one. I appoint myself as the Privacy Officer
- I get a breach process sorted so I know what a notifiable privacy breach is and how to deal with it
- I do refresher training via e-learning modules on the Privacy Commissioner's website
- If I have a privacy question I start by looking at AskUs on

[privacy.org.nz](https://www.privacy.org.nz)



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My business is going great! I get an employee!



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It's no drama though – I know that it's simple to make changes!

- I'll be collecting personal information about my new employee
- I add some more information into my privacy policy, and I cover employee-specific collections in my onboarding documentation



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My final thoughts

- Covering off the basics of privacy isn't too tricky and you can scale these steps up if you need to
- If anything I've talked about today is brand new for you don't panic, have a look at the guidance on [privacy.org.nz](https://www.privacy.org.nz)
- Don't worry if it's not perfect the first time. Keep iterating!

Thanks for coming! Any questions?



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