

PRIVACY AND PERSONAL INFORMATION POLICY

Policy Owner	Head of Governance and Strategy
Contact Person	Head of Governance and Strategy
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Purpose

1. The Privacy Act 2020 provides for the protection of individuals' right to privacy, while balancing other rights and interests that need to be taken into account in certain circumstances. It sets out 13 information privacy principles which govern how Te Papa should collect and manage personal information. It also requires Te Papa to inform the Privacy Commissioner of notifiable privacy breaches and provides for investigation of such breaches by the Privacy Commissioner.
2. Te Papa is required to collect and maintain certain personal information about individuals in order to carry out its business. Te Papa recognises the importance of managing personal information appropriately. This policy describes how the principles and requirements of the Privacy Act 2020 will be upheld in the course of Te Papa's work and the obligations Te Papa kaimahi must meet in carrying out their mahi.

Scope

3. This policy applies to all kaimahi who may collect, create, receive, access, use, store or disclose personal information about individuals.
4. Kaimahi responsible for engaging other individuals and organisations who collect, handle, process, transport and store personal information on Te Papa's behalf are required to ensure the third party is aware of the requirements of the Act and their obligation to assist Te Papa in upholding this policy and complying with relevant legislation.

Definitions

5. The following definitions apply for the purpose of this policy:

Act: means the Privacy Act 2020.

Document: has a broad meaning in the Act, which should be noted for the purpose of implementing this policy, and includes:

- any writing on any material;
- any information recorded or stored by means of any computer or other device, and any material subsequently derived from information so recorded or stored;
- any label, marking, or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- any book, map, plan, graph, or drawing; and
- any photograph, film, negative, tape, or any device in which one or more visual images are embodied to be capable (with or without the aid of some other equipment) of being reproduced.

Kaimahi: means all Te Papa employees, contractors, agents, board members and volunteers.

Notifiable Privacy Breach: means a privacy breach (being unauthorised or accidental access to, or disclosure, alteration, loss or destruction of, personal information, or an action that prevents Te

PRIVACY AND PERSONAL INFORMATION POLICY

Papa from accessing personal information on a temporary or permanent basis) that it is reasonable to believe has caused serious harm to the affected individual/s or is likely to do so.

Personal information: means “information about an identifiable individual”. It is not limited to information that is particularly sensitive, intimate or private, and captures information regardless of the form in which it is held. Some examples of personal information held and collected by Te Papa include:

- kaimahi contact and salary information, employment agreements, personnel records, and payment information;
- images of an individual;
- copies of passports and drivers licenses;
- contact information for individuals in connection with tours and research requests;
- financial and personal contact information for individuals whom Te Papa contracts for provision of services; and
- information collected about identifiable individuals who visit Te Papa, including those who attend Te Papa for events and functions.

Privacy Officer: refers to the individual appointed to act as privacy officer for Te Papa, in accordance with paragraph 17 of this policy and the requirements of the Act.

Statement of principles

6. Te Papa recognises the importance of appropriate management of all personal information, as it helps to maintain confidence in the organisation and the wider public service.
7. Te Papa will increase privacy awareness and maintain an internal privacy culture in which kaimahi value and protect the personal information they manage, in order to minimise the risk of accidental loss or release or unauthorised use.
8. The [Information Privacy Principles \(IPPs\)](#) described in the Act are central to Te Papa’s management of information about individuals and must be considered when handling personal information. The IPPs are summarised below. Note that the information below is summary only, and if kaimahi have questions about specific obligations and exceptions they should consult the Privacy Officer and refer to the Act:

Principle 1 - purpose for collection

Te Papa will only collect personal information where such collection is necessary for a lawful purpose connected with what Te Papa does.

Principle 2 - source of information

Personal information will be collected directly from the individual concerned. There are some exceptions to this, including where Te Papa believes on reasonable grounds that:

- the information is publicly available;
- the individual concerned authorises collection of information from someone else;
- compliance is not reasonably practicable in the circumstances; or
- the information will not be used in a form that identifies the individual.

Principle 3 – what to tell an individual

When Te Papa collects personal information directly from the individual concerned, it will take reasonable steps to ensure the individual is aware of:

- the fact that the information is being collected;
- why it is being collected (covered in more detail below);
- the intended recipients (usually Te Papa is the only recipient, but in some cases there may be other intended recipients – e.g. if manuhiri or kaimahi information needs to be shared

PRIVACY AND PERSONAL INFORMATION POLICY

with a third party to support arrangements for a particular exhibition or event);

- that Te Papa is the agency collecting and holding the information, and provide Te Papa's address (being 55 Cable Street, PO Box 467, Wellington, 6011);
- whether the supply of information is voluntary or mandatory and the consequences if all or any part of the requested information is not provided. Note that most information collected by Te Papa is supplied on a voluntary basis; and
- that individuals are entitled to request access to and correction of their personal information and can do so by contacting privacy@tepapa.govt.nz.

What constitutes "reasonable steps" will depend on the circumstances of collection, and Te Papa will use a range of options as appropriate (e.g. signage, notices, brochures, letters, and through this policy).

The obligation to make individuals aware of the above matters is subject to limited exceptions which are set out in the Act.

By way of example only, and not as an exhaustive list, Te Papa collects information from manuhiri, kaimahi, and through its websites. Personal information may also be held in relation to museological activity (for example, in developing and caring for collections and research).

- In respect of **manuhiri**, Te Papa collects images of people who attend its museum premises in person (both through CCTV and through Te Papa photographers). CCTV footage is collected for health, safety and security purposes, and is covered in more detail in the CCTV section of this policy. Photography footage taken by Te Papa photographers (excluding CCTV) is collected on a voluntary basis to record activity at Te Papa and for marketing purposes. Te Papa also collects information about manuhiri who book or sign up for particular exhibitions, events and functions (collectively referred to as **events**), in order to facilitate the administration of, payment for, and communications about such events. Te Papa may also use statistical information collected from manuhiri for events to support its planning processes.
- In respect of **kaimahi**, Te Papa collects information about applicants, employees, volunteers, and contractors. Examples include contact details, CVs, health information, immigration information, union membership, conflicts of interest, payroll information, and emergency contact details. Some information may be collected from third parties (e.g. Police check results and information from referees). This information is used to process applications, comply with Te Papa's obligations as an employer, and meet health and safety obligations. Te Papa also generates information about kaimahi which it needs to manage the operations and administration of Te Papa and meet its obligations as an employer and in connection with health and safety (e.g. performance information, and CCTV footage).
- In respect of Te Papa's **websites**, information about the information Te Papa collects and how it uses that information is available in Te Papa's website privacy statement. Other web-based material such as research and collections shared through Collections Online may include personal information.

Principle 4 – manner of collection

Te Papa will not collect personal information by:

- unlawful means; or
- means that are unfair or intrude unreasonably on the personal affairs of the individual concerned.

Principle 5 - storage and security

Te Papa will ensure that:

- personal information that it holds is protected by reasonable security measures against loss;

PRIVACY AND PERSONAL INFORMATION POLICY

unauthorised access, use, modification or disclosure; and other misuse; and

- if it is necessary for personal information to be given to a third party in connection with the provision of a service to Te Papa, everything reasonably within the power of Te Papa is done to prevent unauthorised use or unauthorised disclosure of the information.

Principle 6 – access

Upon request, and as soon as reasonably practicable (and in any case within 20 working days), an individual is entitled to receive from Te Papa confirmation of whether Te Papa holds any personal information about them, and access to their personal information. These rights are subject to certain exceptions. By way of example only, requests for information can be refused (or parts of a document can be redacted) if: Te Papa does not hold the information (noting that in some circumstances Te Papa may be obliged to transfer a request to another agency); disclosure would pose a serious threat to the individual or a third party, or could create a significant risk of serious harassment; or disclosure would involve the unwarranted disclosure of the affairs of a third party. There are also certain protections for "evaluative material" – this is defined in the Act, but at a high level covers specific types of employment related information and information regarding the award of a benefit.

There are specific provisions in the Act that govern the process that Te Papa must follow when responding to IPP6 requests, and kaimahi should refer to Te Papa's *Procedure for responding to IPP6 and IPP7 requests*.

The Privacy Commissioner can also direct Te Papa to give someone access to their personal information.

Principle 7 – correction

Everyone is entitled to request correction of their personal information. Note that this is only a right to *request* correction – it is not an unlimited right to require that Te Papa make changes.

There are specific provisions in the Act that govern the process that Te Papa must follow when responding to IPP7 requests, and kaimahi should refer to Te Papa's *Procedure for responding to IPP6 and IPP7 requests*.

Principle 8 – accuracy

Te Papa will not use or disclose personal information without taking reasonable steps to check it is accurate, complete, relevant, up to date, and not misleading.

Principle 9 – retention

Te Papa will not keep personal information for longer than needed for the purpose for which the information may lawfully be used.

Te Papa will retain personal information to carry out its obligations under relevant legislation such as the Public Records Act 2005, Employment Relations Act 2000 and Holidays Act 2003.

When personal information no longer needs to be retained, Te Papa must make arrangements for appropriate disposal having regard to the nature of the information (e.g. secure destruction, transfer to Archives New Zealand, or other appropriate action).

Principle 10 – limits on use

Personal information obtained in connection with one purpose must not be used for another, unless an exception applies. The Act lists a number of exceptions, including situations when Te Papa believes on reasonable grounds that the:

- use is directly related to the purpose for which the information was obtained;

PRIVACY AND PERSONAL INFORMATION POLICY

- information came from a publicly available publication, and in the circumstances it is not unfair or unreasonable to use the information;
- individual concerned has authorised the use; or
- individual concerned is not identified.

The list above is not exhaustive. If kaimahi believe that information should be used for other purposes they should consult the Privacy Officer.

As noted under IPP3, Te Papa will let individuals know the purposes of collection at the time their information is collected. Note that when personal information is collected in connection with an individual's attendance at a particular event, promoting subsequent events by mail or telephone is not a directly related use.

Principle 11 - disclosure of personal information

Te Papa may only disclose personal information in certain circumstances which are set out in the Act. By way of example, these include:

- where disclosure is one of the purposes for which the information was originally obtained (or is directly related to that purpose);
- if the individual concerned gives permission for the disclosure;
- if the information will be used in a way that does not identify the individual;
- if disclosure is necessary to prevent or lessen a serious threat to someone's life or health, or to public health or safety; or
- for the conduct of court proceedings.

While IPP11 *permits* disclosure in certain circumstances, it does not *require* disclosure. Where Te Papa receives a request for information it will assess whether it is appropriate in the circumstances to disclose the requested information.

Principle 12 – disclosure outside New Zealand

Where Te Papa intends to disclose personal information pursuant to certain grounds under IPP11, and that disclosure is to a foreign person or entity, there must be reasonable grounds for Te Papa to believe that the recipient is subject to the Act or is otherwise required to comply with comparable privacy safeguards (and there are various options for satisfying this requirement), or Te Papa must have the permission of the individual concerned (and such permission must be given after Te Papa has expressly informed the individual that their information may not be protected in a comparable way once disclosed to the overseas agency).

Principle 13 - unique identifiers

Te Papa does not assign unique identifiers to individuals (examples of 'unique identifiers' include IRD numbers, bank customer numbers, drivers' licence and passport numbers).

Privacy by Design

9. Kaimahi are responsible for ensuring privacy measures are in place regarding the work they do, including embedding IPPs into business systems and processes. Essential responsibilities include fair collection and justified use, managing risk, responding appropriately to access and correction requests, ensuring information security, and arranging appropriate disposal.
10. Where relevant, Te Papa will take reasonable steps to make third parties with whom it has agreements and contracts for service aware of the obligations of this policy, and obtain appropriate assurance that personal information is held securely and handled in accordance with the relevant legislation by such third parties.
11. The Privacy Officer must be consulted with when adopting new business systems or introducing services requiring the collection, storage and/or use of personal information, whether such

PRIVACY AND PERSONAL INFORMATION POLICY

personal information relates to staff or members of the public. A privacy impact assessment (PIA)¹ should be undertaken when designing, implementing or changing systems or practices that involve use of personal information. These precautions facilitate appropriate management of information and mitigate risk of privacy breaches.

Closed Circuit Television

12. Te Papa takes safety seriously. Te Papa uses monitored Closed Circuit Television (CCTV) without audio to monitor risks to health, safety and security, to assist security staff in responding quickly to issues, and to support the goal of a zero-harm environment for our manuhiri, kaimahi and the collections in Te Papa's care. Te Papa notifies manuhiri and kaimahi of the use of CCTV through signage at its facilities.
13. All monitoring and use of CCTV footage is carried out in accordance with the Privacy Act 2020, and recorded footage is held securely. Access to CCTV footage (both on a live basis for monitoring purposes, and on a retrospective basis for investigation of issues) is restricted to security staff, who may share the footage with other kaimahi where appropriate. CCTV footage is subject to a regular destruction schedule.
14. CCTV footage is included within the definition of a document under the Act. Te Papa will consider any requests for CCTV footage in accordance with the Act, and will have regard to the privacy interests of other individuals in the requested footage, security considerations, and other relevant considerations. Te Papa may share CCTV footage with Police where it is relevant to the detection, investigation or prosecution of an offence.

Requests for access to personal information (IPP 6) and correction of personal information (IPP7)

15. A request for personal information will be considered under the provisions of the Act, even if the Act is not mentioned explicitly.
16. The Privacy Officer is responsible for managing requests for personal information and correction of information and facilitates compliance with the process set out in the *Procedure for responding to IPP6 and IPP7 requests*.
17. Note that Te Papa is subject to the Official Information Act 1982 (OIA) and may receive requests for information under the OIA. The Privacy Officer will be involved in responding to any OIA requests where the scope of the request includes personal information (noting that parts of the OIA provide for protection of the privacy of natural persons, and address rights of access to personal information in certain circumstances).

Privacy Officer Responsibilities

18. The Act requires that all organisations have at least one Privacy Officer. The Privacy Officer is responsible for ensuring compliance with the Act, dealing with requests made under the Act, and working with the Privacy Commissioner in respect of any investigations under the Act in relation to the organisation. The Head of Governance and Strategy is Te Papa's Privacy Officer. The Privacy Officer:
 - deals with requests for access to, or correction of personal information;
 - trains Te Papa staff on their responsibilities in respect of privacy;
 - advises on how to ensure Te Papa's business practices comply with privacy requirements;
 - advises on the privacy impacts (if any) of changes to Te Papa's business practices, and supports kaimahi to carry out privacy impact assessments (PIAs);
 - deals with any complaints about possible breaches of privacy;
 - facilitates the review and investigation of privacy breaches;

¹ See the [Guide to Privacy Impact Assessments \(PIA\)](https://www.privacy.org.nz/publications/guidance-resources/privacy-impact-assessment/) for practical advice when developing business processes involving personal information: <https://www.privacy.org.nz/publications/guidance-resources/privacy-impact-assessment/>

PRIVACY AND PERSONAL INFORMATION POLICY

- assesses whether breaches meet the reporting threshold to be notifiable to the Privacy Commissioner; and
- manages Te Papa’s reporting relationship with the Privacy Commissioner.

Breaches of the policy

19. All known and suspected privacy breaches require immediate remedial action, no matter the sensitivity of personal information. Given the varied nature of privacy breaches, no ‘one size fits all’ response is possible; responses should be proportional and appropriate having regard to the circumstances of the privacy breach.
20. A privacy breach occurs where there is:
 - a. inappropriate collection of personal information;
 - b. unauthorised or accidental access to personal information;
 - c. unauthorised or accidental use, disclosure, alteration, loss or destruction of personal information; or
 - d. any action that prevents Te Papa from accessing personal information on a temporary or permanent basis.
21. If a privacy breach occurs, kaimahi who become aware of the breach must immediately contact the Privacy Officer, who will advise on the next steps. The Privacy Officer has responsibility for managing the breach, including by ensuring that appropriate kaimahi are involved in assessing and containing any breach; evaluating the risks associated with the breach; making relevant notifications (e.g. to affected individuals); and taking steps to prevent further breaches.
22. Under the Act, Te Papa is required to report Notifiable Privacy Breaches to the Privacy Commissioner. The Privacy Officer is responsible for determining whether a privacy breach is notifiable, and for reporting such breaches to the Privacy Commissioner.
23. Te Papa collects information about, and reports to its Executive Leadership Team on, privacy breaches. It is important to remember that reporting a breach is primarily so that Te Papa can improve its processes and seek better compliance.
24. In some cases, a privacy breach may result in an employment investigation being invoked and in disciplinary action or dismissal.

Training

25. This policy is available to all kaimahi through the Policy Register, accessible in Pou Mataaho and via Kupenga.
26. Privacy advice and training is available from the Privacy Officer who can provide kaimahi with the information and skills necessary to improve privacy awareness and culture.

References

Other related policies and documents	Related Legislation
<ul style="list-style-type: none">• Te Papa Code of Professional Conduct• Protected Disclosures Policy• Photography and Filming Policy• Te Papa Records Management Policy• Information Technology Policy	<ul style="list-style-type: none">• Privacy Act 2020• Public Records Act 2005• Protected Disclosures (Protection of Whistleblowers) Act 2022• Official Information Act 1982

Review

27. This policy will be reviewed every three years or earlier if required by change in legislation or good practice guidance.

PRIVACY AND PERSONAL INFORMATION POLICY

Approval by Tikanga Haumaru

Recommending authority	Executive Leadership Team
Approval authority	Tikanga Haumaru
Date	24 July 2023
Approved	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Document History

Version number	Date Created	Author/Contributor	Changes Made	Approved by	Date
1.0	February 2020	Zoë Genet (Legal)	-	AR	17/2/2020
2.0	October 2020	Zoë Genet (Legal)	To incorporate the requirements of the Privacy Act 2020.	Tikanga Haumaru	22/04/2021
3.0	March 2023	Steve Pasene (contractor) Peter Corley (Privacy Officer) Frances Lawrence (Principal Advisor Strategy, Planning and Performance)	Review Privacy Act 2020 to include more information regarding principles and CCTV section. Regular three year review.		

PRIVACY AND PERSONAL INFORMATION POLICY

PROCEDURE FOR RESPONDING TO IPP6 AND IPP7 REQUESTS

Background

1. This procedure sets out the general approach Te Papa will take when considering and responding to requests for information made under Information Privacy Principle (IPP) 6, and requests for correction to information made under IPP 7, of the Privacy Act 2020 (commonly known as an IPP6 or IPP7 request). Detailed procedural requirements for responding to an IPP6 or IPP7 request are set out in Part 4 of the Privacy Act 2020 (the **Act**). This procedure should be read and applied in conjunction with the Act.
2. IPP6 refers to [Information Privacy Principle 6: Access to personal information](#). Any individual (or their representative) is able to make a request to an agency about whether information is held about them and request access to that information.
3. IPP7 refers to [Information Privacy Principle 7: Correction of personal information](#). An individual (or their representative) can request a correction to any information held about them by an agency.
4. IPP6 and IPP7 requests may only be made by the individual to whom the information relates or their representative. This procedure generally refers to the "requestor". Note that a representative may be someone who is legally appointed (through a Power of Attorney or Enduring Power of Attorney) or who is authorised by the person to act on their behalf (noting that this should usually be evidenced in writing). In some circumstances, a parent or guardian may be entitled to act as the representative of a child (if the child is too young to act on their own behalf, or if the child has agreed to their parent acting as their representative).

Responsibilities

5. The Privacy Officer is responsible for monitoring the privacy inbox (privacy@tepapa.govt.nz) and responding to requests of such requests.
6. All Te Papa kaimahi are required to assist the Privacy Officer in responding to requests if asked.
7. The Executive Leadership Team is responsible for ensuring their teams are aware of the Policy and this procedure, and their obligations under those documents.

Timeframes

8. IPP6 and IPP7 requests must be responded to as soon as practicable and no later than 20 working days after receipt.
9. An extension to this period may be made for a reasonable period of time if:
 - a. The request is for a large quantity of information or requires a search through a large quantity of information and meeting the original timeframe would unreasonably interfere with Te Papa's operations (s48(1)(a));
 - b. Consultations need to be made in order to make a decision that will reasonably take longer than the original time limit (s48(1)(b)); or

PRIVACY AND PERSONAL INFORMATION POLICY

- c. Processing the request raises complex issues that will reasonably take longer to resolve than the original timeframe (s48(1)(c)).
10. Notification of extensions must be sent to the requestor within the original 20 working day period, with the new deadline and the reason for the extension, and the notification must advise that the requestor can complain to the Privacy Commissioner about the extension.
11. Requestors can ask for a request to be treated as urgent. Urgency must be taken into consideration when determining the response.
12. Requests can be transferred to another agency if Te Papa reasonably believes another agency holds the information that is being requested. Transfers must be made within 10 working days of the request being received.

IPP6 – request for information

13. The Privacy Officer will:
 - a. provide the requestor with an acknowledgement of receipt and the intended deadline for Te Papa's response. This acknowledgement is usually via email and should be completed as soon as practicable following receipt of the request;
 - b. review the request and consider whether it can be responded to urgently (if relevant);
 - c. contact kaimahi responsible for administering systems where personal information may be located and coordinate with them to arrange for collation and review of requested information; and
 - d. provide Te Papa's substantive response to the request for information.
14. Kaimahi responsible for storage systems where personal information may be located will advise the Privacy Officer of the time required to conduct a search and subsequently any information located.
15. The Privacy Officer will determine:
 - a. whether the request should be transferred to another agency, and if so will arrange the transfer and communicate the transfer decision to the requestor in accordance with s43 of the Act. Note that transfers to another agency are not permitted if Te Papa has good reason to believe that the requestor would not want the request transferred, and in such circumstances Te Papa must notify the requestor that the request has not been transferred, and the agency to which the request could be transferred. Usually, the Privacy Officer should consult the requestor before arranging a transfer;
 - b. whether an extension is required and if so, decide on a reasonable period of time for the extension and communicate the extension to the requestor;
 - c. whether information can and should be released in full, withheld (either in full or in part) having regard to the withholding grounds in the Act, or released subject to conditions of release being agreed with the requestor. In limited circumstances, it may be appropriate for Te Papa to neither confirm nor deny that it holds the information;
 - d. application of all relevant provisions set out in s57 of the Act (including the obligation on Te Papa to be satisfied of the identity of the requestor, that the request is not being made under threat of harm, that the information is only received by the appropriate person, and in the case of a request by a representative, that the representative is properly authorised);

PRIVACY AND PERSONAL INFORMATION POLICY

- e. whether a charge for the information is appropriate in accordance with s66 of the Act (noting that as a public sector agency, Te Papa may only impose a charge with the Privacy Commissioner's authorisation); and
 - f. the way/s in which the information will be made available to the requestor. The Act provides various options for provision of information. Note that where access is granted, this does not give the requestor the right to take away original records (which Te Papa is required to maintain in accordance with the Public Records Act 2005).
16. The Privacy Officer will then apply any relevant withholding provisions and communicate the decision to the requestor, with information about how to make a complaint to the Privacy Commissioner (if relevant).

IPP7 – request for correction of information

17. The Privacy Officer will:
- a. provide the requestor with an acknowledgement of receipt and the intended deadline for Te Papa's response. This acknowledgement is usually via email and should be completed as soon as practicable following receipt of the request;
 - b. review the request and consider whether it can be responded to urgently (if relevant);
 - c. contact kaimahi responsible for administering systems where personal information may be located, and coordinate with them to arrange for collation of relevant information; and
 - d. provide Te Papa's substantive response to the request for correction.
18. Relevant kaimahi will support the Privacy Officer in assessing whether it is appropriate to action the requested correction.
19. The Privacy Officer will determine:
- a. whether the request should be transferred to another agency, and if so will arrange the transfer and communicate the transfer decision to the requestor in accordance with s62 of the Act. Note that transfers to another agency are not permitted if Te Papa has good reason to believe that the requestor would not want the request transferred, and in such circumstances Te Papa must notify the requestor that the request has not been transferred, and the agency to which the request could be transferred. Usually, the Privacy Officer should consult the requestor before arranging a transfer;
 - b. whether an extension is required and if so, decide on a reasonable period of time for the extension and communicate the extension to the requestor;
 - c. whether there are any grounds to refuse to correct information, or if the requested correction should be made; and
 - d. whether a charge is appropriate in accordance with s66 of the Act (noting that as a public sector agency, Te Papa may only impose a charge with the Privacy Commissioner's authorisation).
20. The Privacy Officer will then communicate the decision to the requestor. Where the request has been granted, the Privacy Officer will work with relevant kaimahi to arrange the correction. Any change to records should note the date on which the change is made. Where the request is not granted, the Privacy Officer's communication to the requestor must include the reason why Te Papa has refused the request, the requestor's right to

PRIVACY AND PERSONAL INFORMATION POLICY

provide a statement of correction and request that it be attached to the information, and the requestor's right to make a complaint to the Privacy Commissioner.

21. Where a requestor asks for a statement of correction to be attached to information, the Privacy Officer will respond to that request as soon as reasonably practicable.

Storage of information about requests and decisions

22. Details of requests for information and/or correction (and action taken by Te Papa in response to such requests) will be summarised on a register of requests and a copy of relevant correspondence saved in a secure location within Pou Mataaho, in order to support any future complaint investigation initiated by the requestor and/or by the Privacy Commissioner. Access to this information will be limited to the Privacy Officer, Head of People Safety and Culture, Tumu Whakarae, Kaihautū and EA to the Co-Leaders.