



# External Privacy Statement

This Privacy Statement ('Statement') sets out how Manawa Energy Limited ("Manawa") may collect, use, store, share and disclose, personal information about Manawa customers, potential customers, persons associated with Manawa customers, suppliers, consultants and others (referred to as "external party" or "external parties") and explains how an external party can exercise their privacy rights.

Manawa is bound by the Privacy Act 2020 ("Act") and the privacy principles set out in the Act. "Personal Information", means any information about an individual or that could identify an individual.

## Why Manawa collects Personal Information

Manawa may collect and hold personal information about external parties as part of Manawa's legal obligations and in order to conduct its business operations ('Manawa Business').

## How Manawa collects personal information

Personal information may be collected in a number of ways including forms, surveys, documentation or communications provided to us (including via the Manawa website or other Manawa applications), in person meetings or telephone conversations or footage from drones or security cameras installed or used at Manawa premises and generation sites.

Manawa aims to collect personal information directly from external parties, or a third party acting on an external party's authority. In some circumstances Manawa may need to collect personal information from Manawa's service providers or other third parties to conduct Manawa Business (including data providers, government bodies, other market participants or market operators). Manawa may also collect information indirectly if it is publicly available or through Manawa's website and

mobile apps via tracking technologies such as cookies, web beacons and measurement software.

External parties do not have to provide Manawa with or allow Manawa to collect personal information and Manawa will advise if there are implications where information is not provided.

## What personal information Manawa collects

In general, the type of personal information that Manawa collects includes (but is not limited to):

- names, addresses, contact details and date of birth;
- bank account details, payment method preference and other financial information;
- information related to customer products and usage and location;
- contents of telephone conversations, which may be recorded for training and quality assurance purposes; or
- other information which assists in conducting Manawa Business and to meet Manawa's legal obligations.

## How does Manawa use or disclose personal information

Manawa will use personal information for the purpose for which it is collected, for a directly related purpose or as otherwise authorised by an external party or by the Act. This may include:

- communicating and managing Manawa's relationships with customers, suppliers, stakeholders or others (including verifying the identity of an individual);
- verifying a persons identity or conduct pre-employment checks or for recruitment purposes;
- operating and administering customer accounts;

- general and internal business purposes, including maintaining and developing Manawa's business systems, processes and infrastructure, carrying out financial transactions and undertaking credit management and debt recovery activities;
- providing credit information (as defined in the Credit Reporting Privacy Code 2020) about an external party to credit reporting agencies, so that Manawa can participate in their credit monitoring services and receive updates on the information they hold about an individual and any matters which may impact Manawa's ongoing relationship;
- any specific purpose for which Manawa notifies an external party at the time the personal information is collected;
- dealing with commercial or legal conflicts;
- for safety and security purposes (including Manawa's workplace, staff, visitors, associated third parties and customers);
- to carry out research, data analysis, conduct surveys or provide promotional information and newsletters;
- if it is necessary to facilitate the sale, disposal, assignment or transfer of Manawa or any assets, subsidiaries or related companies;
- or
- to comply with legal obligations, governmental, or regulatory requirements or in connection with any legal proceedings.

Manawa may also disclose personal information to third party contractors or agents and other organisations (inside or outside of New Zealand) in the course of conducting Manawa Business. This may include:

- third party service providers such as metering service providers, lines companies, web hosting providers, IT system administrators, software providers, providers, data management, processing or storage service providers, banks or other financial service, mailing houses, couriers, payment processors, electronic network administrators, debt collectors, credit reference agencies;
- professional advisers including accountants, solicitors, consultants or auditors;
- a court or tribunal, regulatory or enforcement agencies or government

agencies; or

- as otherwise authorised by an external party.

Manawa will keep personal information for as long as it has a relationship with the external party and for a period of time afterwards where we have an ongoing business need to retain it.

### Accessing and correcting personal information

An external party may request access to personal information Manawa holds about them, request updates or corrections to personal information, or make a request to restrict or cease using and disclosing that personal information by setting out a request in writing and sending it to us at [legal@manawaenergy.co.nz](mailto:legal@manawaenergy.co.nz) for the attention of the Privacy Officer.

Manawa will consider and process any such request in accordance with the Act.

### Complaints

A privacy related complaint can be emailed to [legal@manawaenergy.co.nz](mailto:legal@manawaenergy.co.nz) for the attention of the Privacy Officer.

If an external party's privacy concerns have not been resolved by Manawa, or an external party wishes to make a request for more information, the New Zealand Office of the Privacy Commissioner can be contacted via its website [www.privacy.org.nz](http://www.privacy.org.nz) or free phone at 0800 803 909. Further information about how to submit a complaint is available on the Privacy Commissioner's website.