



PRIVACY AND INFORMATION MANAGEMENT | POLICY

Privacy Statement

How ProTrim collects, uses, stores and protects personal information.

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POLICY OWNER	Isaac Cotter

DOCUMENT OVERVIEW

This privacy statement explains how ProTrim Services Limited (ProTrim, we, us or our) collects, uses, stores and shares personal information. It applies when you contact us, use our website, request or receive services, take part in a site assessment, receive or accept a proposal, work with us, supply us, apply for a role, or otherwise interact with ProTrim.

We handle personal information in accordance with the New Zealand Privacy Act 2020 and its information privacy principles. This statement is intended to be clear and practical; it does not limit any rights or obligations that apply under law.

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Who is responsible for your information

ProTrim Services Limited is the agency that collects and holds the personal information covered by this statement. ProTrim is based in Christchurch, New Zealand.

Privacy Officer: Isaac Cotter, Owner and Director

Email: admin@protrim.co.nz

You can use this contact for privacy questions, access or correction requests, complaints, or concerns about how ProTrim has handled your information.

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Personal information we may collect

We collect only information that is reasonably necessary for our work. Depending on how you interact with us, this may include:

- identity and contact information, such as your name, role, organisation, email address, phone number and business address;
- customer, supplier, contractor, client-contact or employment information relevant to our relationship with you;
- site and service information, including property addresses, access instructions, operating hours, site contacts, hazards, restrictions, customer requirements and grounds-maintenance history;
- communications and records of enquiries, meetings, instructions, feedback, complaints and other correspondence;
- assessment evidence, such as site notes, annotated maps, measurements, photographs, video, audio recordings, transcripts, location points and time-stamped field observations;
- quote, proposal, contract and acceptance information, including selected options, approver details, signatures, dates and supporting evidence;
- billing and transaction information required to issue invoices, process payments and maintain accounting or tax records;
- website and technical information that may be logged by our hosting or security providers, such as IP address, browser or device type, requested pages, timestamps, diagnostic information and security events; and
- other information you choose to provide, or that we are authorised or required to collect.

Personal information can include information that does not name you if you can still reasonably be identified from it.

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How we collect information

We usually collect information directly from you when you complete a form, contact us, meet us onsite, request a quote, take part in an assessment, provide instructions, accept a proposal, apply for work, or correspond with us.

We may also receive information about you from a client or employer, another site representative, a referee, a contractor or supplier, a tender or procurement portal, publicly available business information, or a service provider acting on our behalf.

Where we collect personal information about you indirectly, we will take reasonable steps to ensure you are told about the collection and the matters required by the Privacy Act, unless you already know, notification would not prejudice your interests, or another lawful exception applies.

IMPORTANT**INFORMATION YOU CHOOSE TO PROVIDE**

Providing personal information is generally voluntary unless we tell you that it is required by law or by a client or site requirement. If you do not provide information we reasonably need, we may be unable to answer an enquiry, prepare an accurate quote, obtain site access, assess or perform the work, issue or administer a proposal, or meet a legal or safety obligation.

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How we use personal information

We may use personal information to:

- respond to enquiries and decide whether our services are suitable;
- identify, contact and communicate with relevant business or site representatives;
- prepare for and conduct site visits, assessments and grounds-maintenance work;
- measure sites, document conditions, identify requirements and develop scopes, estimates, quotes and proposals;
- manage customer, supplier, contractor and employment relationships;
- schedule, deliver, check and improve our services and communicate about work;
- manage access, health and safety, environmental, security, insurance and incident requirements;
- issue invoices, receive payments and keep financial, contractual and audit records;
- protect our people, systems, equipment, clients and legal rights; prevent misuse or fraud; and investigate concerns;
- meet legal, regulatory, contractual, procurement and professional obligations;

- send relevant service information or lawful business marketing, with a clear way to opt out of marketing communications; and
- analyse and improve our processes, tools, proposals and customer experience using information that is accurate, proportionate and appropriate for that purpose.

We will not use personal information for a new purpose that is unrelated to the purpose for which it was collected unless you authorise the use or the law otherwise permits it.

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Site photographs, recordings, location and AI-assisted tools

Some site assessments may benefit from photographs, video, audio recording, transcription or location-linked notes. Before intentionally recording a conversation, we will explain the purpose and intended use, provide relevant retention information, and seek the participant's agreement. A reasonable note-taking alternative will be available where recording is not appropriate.

We use this information to document the site and customer requirements, prepare and verify the assessment, develop the scope and proposal, and maintain an appropriate record of decisions. Internal assessment media will not automatically be included in a customer-facing proposal.

If we use an approved AI-assisted service for transcription, classification or drafting, the source information may be processed by that service provider on our behalf. AI output is treated as a suggestion and reviewed by a person before it is relied on for site scope, pricing or a proposal. We do not use automated processing alone to make significant decisions about individuals.

We will not deliberately record outside an active assessment or agreed purpose. At schools and other sites where children, young people or vulnerable people may be present, we will follow site rules, avoid capturing identifiable people unless necessary and authorised, and remove, crop or restrict incidental material where reasonably practicable.

Raw recordings and precise location data will be retained only for the period notified or reasonably required for the assessment, proposal, contract, dispute or legal purpose. Approved notes, decisions and audit information may be retained separately after source media is deleted.

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When we may share information

We may disclose personal information only where reasonably necessary for the purpose for which it was collected, you have authorised the disclosure, or the law otherwise allows or requires it. Recipients may include:

- ProTrim personnel and contractors who need the information to perform their role;

- the relevant customer, property manager, site representative or other party involved in arranging, approving or coordinating the work;
- trusted providers that support hosting, storage, communications, mapping, transcription, document generation, accounting, payment, security, backup or other business systems;
- professional advisers, insurers, auditors and prequalification or certification providers where relevant;
- regulators, emergency services, law-enforcement agencies, courts or other authorities where disclosure is authorised or required; and
- another person or organisation where disclosure is necessary to prevent or lessen a serious threat, protect legal rights, or address a suspected incident, subject to the Privacy Act.

We do not sell personal information.

Some service providers may store or process information outside New Zealand. Before disclosing personal information overseas, we will take reasonable steps to ensure the recipient is subject to privacy safeguards comparable to those in New Zealand, obtain your express authorisation after informing you of the implications, or rely on another lawful basis under information privacy principle 12. A provider processing information solely as our agent remains subject to our instructions and appropriate contractual and security controls.

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Storage, security and retention

We use safeguards that are reasonable for the nature and sensitivity of the information and the risks involved. These may include controlled access, strong authentication, encryption in transit and at rest where available, secure devices and cloud services, backups, update and patch practices, confidentiality requirements, staff or contractor guidance, and review of third-party providers.

No method of storage or transmission is completely secure. If we become aware of a security concern, we will act promptly to contain it, protect affected information and investigate what occurred.

We retain personal information only for as long as it is reasonably required for the purpose for which it was collected, or to meet legal, tax, accounting, insurance, health and safety, contractual, dispute or audit requirements. When information is no longer required, we will securely delete, destroy or de-identify it where reasonably practicable.

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Access, correction and your choices

You may ask for access to the personal information ProTrim holds about you and ask us to correct information you believe is wrong. Send your request to admin@protrim.co.nz and include enough detail for us to identify the relevant information. We may need to verify your identity or authority before releasing or changing information.

We will respond as soon as reasonably practicable and within the time required by the Privacy Act, usually 20 working days. The Act permits limited grounds for withholding information or extending the response time. If we do not make a requested correction, you may ask us to attach a statement of correction to the information.

You may also ask us to delete information or withdraw an optional permission. We will consider the request, but we may need to retain information where a continuing lawful purpose or legal obligation applies. You can unsubscribe from marketing messages using the link or instructions in the message, or by contacting us.

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Privacy breaches

A privacy breach may involve the loss, unauthorised access, disclosure, alteration or destruction of personal information. ProTrim will take reasonable steps to contain and assess a suspected breach, reduce harm, preserve relevant evidence and address the cause.

If a breach has caused or is likely to cause serious harm, we will notify the Office of the Privacy Commissioner and affected people as soon as practicable unless a lawful exception applies. We aim to notify the Commissioner within 72 hours of becoming aware of a notifiable breach, even if the investigation is continuing.

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Questions or complaints

Please contact ProTrim's Privacy Officer first so we have an opportunity to understand and resolve your concern.

Privacy Officer: Isaac Cotter, Owner and Director

Email: admin@protrim.co.nz

If you are not satisfied with our response, you may contact or make a complaint to the Office of the Privacy Commissioner at www.privacy.org.nz.

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Changes to this statement

We may update this statement when our services, systems, suppliers or legal obligations change. The current version will show its effective date. Material changes will be communicated in a way that is reasonable in the circumstances. We will review this statement at least annually and earlier after a material privacy, technology or business change.