

# AT&T Business Customer New Zealand Privacy Notice

The AT&T Business Customer New Zealand Privacy Notice (Notice) explains AT&T's commitment to compliance with the New Zealand's Privacy Act (Privacy Act) and how the Privacy Act affects you as a user of AT&T business services. This Notice defines key terms and answers important questions, such as who is covered by the Privacy Act, what the Privacy Act requires, and how AT&T operates within those requirements.

## AT&T's Commitment to Data Protection

AT&T is committed to fulfilling our responsibilities in relation to collection, retention, use, and other processing of Personal Information that is within the scope of the Privacy Act. Such Personal Information will be processed only for lawful and appropriate purposes. AT&T has implemented measures designed to ensure security of Personal Information and to prevent unauthorized or accidental access, erasure, or other misuse of Personal Information. AT&T will facilitate the exercise of individual rights in an effective and transparent manner.

## Definitions

Term	Meaning
Privacy Act	New Zealand Privacy Act 2020
AT&T Business Customer	A legal entity (excluding AT&T affiliates) that has contracted with AT&T to provide services
Individual	An identified or identifiable natural person authorized by an AT&T Business Customer to use the services or to interact with AT&T on behalf of the AT&T Business Customer
Data Controller	An entity that determines the purposes and means of the processing of Personal Information
Personal Information	Any information about an identifiable individual
Processing	Any operation(s) performed on Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
Services	The products and services provided by AT&T under a contractual agreement between AT&T and the AT&T Business Customer

## Who is covered by this Notice?

This Notice applies when:

1. An Individual creates Personal Information through use of AT&T Services within New Zealand in connection with the Individual's relationship with an AT&T Business Customer or AT&T otherwise Processes Personal Information of an Individual who is in New Zealand;
2. Such services are within the scope of the Privacy Act; and



3. AT&T functions as a Data Controller when Processing the Personal Information of such Individual.

Additional information for the Individual may be available directly from the AT&T Business Customer. AT&T maintains other policies and notices, including the [AT&T Privacy Policy](#), that address data protection. Unless specifically stated otherwise, where another notice or policy conflicts with the purposes of this Notice, this Notice will prevail as to any Individual in New Zealand.

## What Personal Information about Individuals does AT&T Process?

AT&T generally Processes the following categories of data, which may include Personal Information of Individuals:

- **Business Contact Data:** Data for general contact or administration purposes, which may include name, job title, employer, address, phone number, email address, instant messaging user name, and similar data.
- **Device Identification Data:** Data that identifies a device from which (or to which) electronic communications are sent (or received); may include Internet Protocol (IP) address, Media Access Control (MAC) address, International Mobile Equipment Identity (IMEI) number, International Mobile Subscriber Identity (IMSI) number, Serial Number, and Unique Device Identifier (UDID).
- **Electronic Communications Metadata:** Data Processed in an electronic communications network for the purposes of transmitting, distributing, or exchanging electronic communications content (but not including electronic communications content); includes data used to trace and identify the source and destination of a communication, data on the location of the device generated in the context of providing electronic communications services, and the date, time, duration, and type of communication.
- **Authentication Data:** User name, password, personal identification number, password hints, and similar data to authenticate users in connection with use of the services or access to information related to the services.

## Why does AT&T Process Personal Information about Individuals?

AT&T Processes Personal Information when an Individual uses the Services or when the AT&T Business Customer provides the Personal Information to AT&T. In connection with the provision of Services, AT&T will generally Process Personal Information of Individuals for the purposes of:

- Providing the Services to the AT&T Business Customer
- Performing obligations and exercising rights with respect to the Services and AT&T's contract with the AT&T Business Customer, including performing related activities and functions
- Complying with legal obligations
- Evaluating, supporting, and enhancing the performance, efficiency, and security of the Services.

## Who has access to Personal Information about Individuals?

Personal Information about Individuals will be disclosed, to the extent required for Service delivery, to appropriate and authorized recipients. Recipients may include: AT&T personnel; third party service providers and subcontractors; and/or other third parties performing services for any of the AT&T companies. Personal Information may also be provided to the AT&T Business Customer and its agents.

Third parties given access to Personal Information about Individuals will be required to use appropriate security measures consistent with Privacy Act requirements when Processing Personal Information and, where the third party is Processing such Personal Information on behalf of AT&T, to do so only pursuant to AT&T's instructions.

AT&T may disclose Personal Information if compelled to do so by a court of law or lawfully requested to do so by a relevant governmental authority using the appropriate means of request. AT&T may disclose Personal Information if AT&T determines it is necessary or appropriate to comply with the law or to protect or defend AT&T's rights, property, or employees.



## Where is Personal Information about Individuals Processed?

AT&T has centralized business activities to better manage a global business. That centralization may result in the transfer of Personal Information to countries outside of New Zealand. For example, an Individual's Personal Information may be transferred for Processing in the United States of America, by AT&T and/or third-party service providers.

AT&T generally transfers Personal Information about Individuals between AT&T affiliates on the basis of our Intra-Group Agreement, which is based on the EU's standard contractual clauses with additional terms to apply to New Zealand for export of Personal Information to third countries

Wherever Personal Information is Processed, AT&T uses appropriate security measures consistent with Privacy Act requirements.

## When is Personal Information about Individuals deleted?

Personal Information will be retained as needed for business administration, tax, or legal purposes and as consistent with applicable law, including the Privacy Act. In many cases, this will require retention through the period of the contract between AT&T and the AT&T Business Customer, or through the period of the relationship between the AT&T Business Customer and the Individual. After that, Personal Information will be destroyed by making it unreadable or undecipherable. While Personal Information is retained, AT&T implements appropriate technical and organizational measures designed to make the Personal Information collected secure. Such measures include:

- Maintaining and protecting the security of computer storage and network equipment and using security procedures that require user names and passwords to access sensitive data;
- Applying encryption or other appropriate security controls to protect Personal Information when stored or transmitted; and
- Limiting access to Personal Information to only those with jobs requiring such access.

## What rights does an Individual have to manage Processing of Personal Information?

The Privacy Act grants the Individual certain rights regarding Processing of Personal Information. AT&T is committed to honoring these rights and has established effective and transparent policies and procedures to do so. An Individual's rights with respect to his or her own Personal Information include:

- **Right of Access.** An Individual may obtain confirmation of whether Personal Information is held by AT&T and, if it is, access the Personal Information.
- **Right to Correction.** An Individual may have inaccurate Personal Information corrected and have incomplete Personal Information made complete.

Individual's right to access Personal Information will depend upon AT&T's ability to determine that it holds responsive Personal Information. As the Personal Information is Processed as part of AT&T's contract obligations to the AT&T Business Customer, for authentication purposes AT&T will coordinate responses to requests of Individuals with the AT&T Business Customer. AT&T therefore recommends the Individual directly contact the AT&T Business Customer to initiate a rights request. AT&T will work with the AT&T Business Customer to determine the appropriate response to a request. Provision of Personal Information in response to an Individual's request shall not adversely affect the rights and freedoms of others.

## Additional Information

An Individual may file a complaint with the New Zealand Privacy Commissioner.

Questions on this Notice may be sent to AT&T's Data Protection Officer at [AskPrivacy@att.com](mailto:AskPrivacy@att.com). Please include "Individual question" in the email's subject line.

