

Standard

TABLE OF CONTENTS

1	PURPOSE	1
2	SCOPE	1
3	AMENDMENTS TO PRIVACY POLICY	1
3.1	Indirect Collection of Personal Information	1
3.2	Credit Information	2
4	BIOMETRIC PROCESSING OF PERSONAL INFORMATION	3
5	DEFINITIONS	4
6	REFERENCED DOCUMENTS	5

1 PURPOSE

Privacy Standard: Downer New Zealand – Indirect Collection and Biometric Information

This Standard explains how we collect, hold, use and disclose Personal Information in the specific contexts outlined below.

It is to be read in conjunction with the Downer [Privacy Policy](#), but applies only to Downer Group Related Companies in New Zealand.

All activities in this standard are consistent with the documents listed in section 5- *Referenced & Associated Documents*.

2 SCOPE

This standard applies to Downer Group Related Companies in New Zealand.

The target audiences for this standard is everyone at, or interacting in any capacity with, Downer Group Related Companies in New Zealand.

3 AMENDMENTS TO PRIVACY POLICY

For clarification, the amendments below are to clauses 4.2 and 4.5 of the Downer [Privacy Policy](#), which is updated for the New Zealand Downer Related Companies as follows:

3.1 Indirect Collection of Personal Information

4.2 Method of Collection

Direct Collection: We generally collect Personal Information about you directly from you, for example when we interact with you in person, over the phone, through written communications (either on paper or electronic) or when you complete forms or answer questions on our website. We may also collect information about you:

- through the use of automated data collection tools on our website, portals and applications, such as cookies; and
- when you access our premises or other sites, or use our assets and applications.

If you provide us with, or authorise us to collect and/or use personal information about another person, you confirm that they have authorised you to provide us, or authorised us to collect and/or use, their personal information in accordance with this Privacy Policy and that you have informed them of their rights to access their personal information, as set out in this Privacy Policy.

Indirect Collection: We may also collect Personal Information about you from someone else on occasions, for example:

- a) *recruitment processes and during employment: such as from your recruitment agencies or applications you use to enquire about or apply for jobs; nominated referees, Ministry of Justice or police for or background or criminal checking processes; third party health providers in relation to pre-employment health or fitness-for-work assessments, alcohol and other drug testing, occupational or other health monitoring (for example, providers such as Alcoliser, TDDA, WellNZ, Habit Health Limited, LifeCare and other general health practitioners or pharmacies as required); other government agencies such as ACC (in relation to information regarding any workplace injuries or accidents), Te Puni Kokiri, Ministry of Social Development (in relation to in-work support, reporting or progress) and/or WINZ, KiwiSaver or IRD, to ensure you are paid correctly in accordance with the law;*
- b) *in relation to health and safety related procedures, training or investigations: from third party sources such as WorkSafe (or other government entities), investigators, witnesses or complainants, third parties who are customers or service providers, or members of the public, health care providers or health practitioners in relation to injuries or accidents;*
- c) *publicly available sources of information: such as public registers;*
- d) *your representatives: such as your legal advisor or trustee, a union or employment or workplace agency that you are involved with, or a third party that you have authorised to provide, or authorised us to collect from them, Personal Information;*
- e) *our service providers: such as credit reporting bodies (refer to further detail below), and identity and fraud checking services;*
- f) *third parties who may or may not be customers or service providers: such as members of the public, who may give us Personal Information about individuals in relation to any probity issues, complaints or compliments, or whistleblowing complaints or reports; and*
- g) *other Downer companies.*

Additionally, we may receive Personal Information from customers or business partners for the purpose of providing a service to them or to their customers. In this context, we hold and use the Personal Information on behalf of the relevant customer or business partner.

3.2 Credit Information

4.5 Credit Information

If you, or an entity associated with you, apply for credit from us, we will collect information about you. We may also collect credit information about you from, and share information about you with, a credit reporting body. The law restricts the purpose for which we can access and use this information. Personal Information that we disclose to a credit reporting body (including default information and repayment history) will also be held by the relevant credit reporting body on its system and accessed by other customers of the credit reporting body in connection with its credit reporting services.

The credit reporting bodies to which we currently disclose such information are: Experian Australia Pty Ltd (ABN 95 006 399 677) (if you are in Australia) and Experian New Zealand Limited (Company number 1931398) (if you are in New Zealand).

You can contact Experian directly to request a copy of their privacy policy or for information about how they manage your Personal Information.

We may use information sourced from Experian (possibly combined with information we already hold) for several purposes, including:

- a) To assess whether to provide you, or an entity associated with you, with credit;
- b) To assess you as a guarantor or to provide credit to a person or entity for which you might act as guarantor;
- c) To carry out general administration and operational tasks; and
- d) As required by relevant laws, regulations, codes of practice and payment systems.

We collect, manage and use credit information in the same way as we manage all Personal Information.

4 BIOMETRIC PROCESSING OF PERSONAL INFORMATION

For the purposes of this section 4, all references to **Downer** are to Downer New Zealand Limited and its Related Companies in New Zealand, which for the avoidance of doubt, includes Hawkins Limited.

Downer collects and uses Biometric Information for the following limited purposes outlined further below:

	WHAT? What type of Biometric Information	WHEN? When do we collect it	WHY? Purpose of collection	Further Detail
1.	A scan of your fingerprint, iris, retina or face	Device Authentication You may choose to access or use our IT equipment, devices, hardware or software assets, systems, applications, by doing a biometric authentication instead of a PIN or password.	Security In order to authenticate that you are the person authorised to be using such devices or equipment	Use of biometric tools for device authentication will be on a voluntary basis.
2.	A scan of your fingerprint, iris, retina or face	Site Access When you visit or work at sites where we are engaged to work, which may use a facial recognition system for accessing the site, which is part of the security system for signing you in.	Security at Site, and Health and Safety In order to verify who you are, and that you are authorised to be at a site where the site is considered to have higher security or safety risks.	Use of biometric tools for site access will be on a voluntary basis. The biometric template based on your facial scan on your enrolment into the site may link to other security features of the sign in such as your SiteSafe Passport verifying your permit, credentials or competencies for the site.

3.	A scan of your facial, eye and head movements	Driver Fatigue Management When you access and use our vehicles, you may choose to use a system of driver fatigue monitoring, which converts the scanning of facial, eye and head movements into algorithms to detect fatigue or distraction events whilst driving	Health and Safety For the health and safety of our drivers, operators and the public.	Use of biometric tools for driver fatigue management will be on a voluntary basis. System-generated alerts are intended to immediately alert the driver. Decisions involving incidents are not made solely on automated processing.
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Purpose: Downer will only carry out the processing of Biometric Information where it is reasonably necessary for the purposes described in this Standard. As detailed above where biometric processing is optional, we also provide alternative methods, which we will notify to you in the particular circumstances or on request.

Retention/deletion: Downer will retain Biometric Information for so long as it is required for the authorised purpose, or as required by applicable law.

Access and correction: You have the right to request access to, or correction of, your Biometric Information. If it is not technically possible for us to extract biometric templates from a biometric system, we will confirm what Biometric Information we hold about you. Refer to the Contact Us section below.

Contact Us: If you have any questions about this Standard or would like to complain about the handling of your personal information, please contact the Downer Privacy Officer using the details set out in the Downer [Privacy Policy](#). You also have a right to make a complaint to the New Zealand privacy regulator, the Office of the Privacy Commissioner (OPC). Current contact details for the OPC are available on the OPC's website at <https://www.privacy.org.nz/>.

5 DEFINITIONS

Unless defined in this document, key terms are used in this document are defined in the Definitions Register.

Biometric Information

has the meaning given to that term in the New Zealand *Biometric Processing Privacy Code 2025*

Downer Group Related Companies in New Zealand

means Related Companies registered under the New Zealand *Companies Act 1993*, whose ultimate holding company is Downer EDI Limited (ACN 003 872 848)

Related Companies

has the meaning given to that term in section 2(3) of the New Zealand *Companies Act 1993*

6 REFERENCED DOCUMENTS

POLICIES

[*DG-CS-PO002 Privacy Policy*](#)

This Privacy Standard: Downer New Zealand was last updated in August 2026