



1. Purpose

- 1.1. This policy (**Privacy Policy**) applies to all personal information (as defined in the Privacy Act 2020 (**Privacy Act**)) (**Personal Information**) held by Rea Limited (referred to as **Rea, us, we, or our** throughout this Privacy Policy).
- 1.2. The purpose of this Privacy Policy is to ensure that all reasonably available measures are in place to protect the privacy of Personal Information collected.
- 1.3. Rea complies with obligations under the Privacy Act.

2. Scope

- 2.1. This Privacy Policy applies to all staff members and processes at Rea and Rea must ensure that, when using or dealing with Personal Information relating to other Rea staff members, learners, third parties, contractors, or any other individuals, they comply fully with this Privacy Policy.
- 2.2. This Privacy Policy applies to all Personal Information provided by you, whether in person or via other means.
- 2.3. This Privacy Policy applies to Personal Information collected from all users of our programmes (including the Rea Accelerated Pathway Programme) (**Programmes**), products, online resources and services (together, the **Services**) and website (<https://rea.coach/>) (**Website**), including but not limited to employer partners, funding partners, learners, third parties, or any other individuals.

3. Privacy Policy Statements

- 3.1. This Privacy Policy is designed to provide transparency into privacy practices and principles in a format that users can navigate, read and understand. This Privacy Policy covers the collection, use and disclosure of Personal Information by Rea, the precautions Rea takes, how individuals can access their Personal Information, and how complaints can be made if privacy is thought to have been breached.
- 3.2. All learners will be deemed to have confirmed their acceptance of our Privacy Policy through the completion of our registration process, including accepting and signing Rea Learner Terms and Conditions.

4. The Privacy Policy covers:

- Collection of Personal Information
- Storage, use and disclosure of Personal Information
- Cookies and data security
- What rights you have over your Personal Information

5. What we collect:

- 5.1. We collect Personal Information from you, including information about your:
 - Name
 - Contact information
 - Location
 - Salary information
 - Identity information
 - Residency status
 - Iwi/Hapu affiliation (if applicable)
 - Disability status (if applicable)
 - Education & work history
 - Referee contact details
- 5.2. We collect your Personal Information in order to:
 - Personalise and improve your experience on the Website with the Services we provide.
 - Assess eligibility for loans and scholarships.
 - Enrol in our Programmes including identification, qualification, academic, and immigration information where relevant.
 - Identify and match learners to available cadetship and job opportunities with our employer partners.
 - Carry out reference checks.

- Analyse aggregated data, which tracks traffic to the Rea sites, and cookies, which are pieces of information transferred to a learners computer hard drive for record keeping.

5.3. We collect Personal Information by the following ways:

- Communications: If you contact us directly, or participate in communications with us (including via our Website or Services), we may receive Personal Information about you. For example, we may receive your name, email address, phone number, the contents of a message that you send to us, and other information you choose to provide.
- Registration Information: If you enrol to participate in our Programmes, we collect your contact details (such as your name, email address and phone number), password and billing information.
- Information we collect automatically: Through your use of our Website or Services we may automatically record Personal Information from your device by using various types of technology. How much Personal Information we collect depends on the type and settings of the device you use to access our Website and Services. For example, we may collect:
 - Device Information: your IP address or other device address or ID, approximate geographic location (country or city-level), web browser and/or device type; and
 - Usage Information: the web pages or sites visited just before or just after using our Website and Services, the pages, features or other content you view or interact with on our Website and Services, and the dates and times of the visit, access, or use of our Website and Services
- Other information: We may collect any other information that you voluntarily provide to us (including via survey).
- Third parties: We may obtain Personal Information from other legitimate sources, third party data aggregators and publically available sources including mail addresses, job titles, email addresses, phone numbers and social media profiles, for the purposes of targeted advertising of Services that may interest you, delivering personalised communications, and event promotion.

6. Who we share your data with

6.1. Besides our staff, we may share your Personal Information with:

- Partner employers in order to find suitable cadetship and job placements.
- Loan partners for loan applications.

- 6.2. If a learner provides Rea with Personal Information about another person, the learner must ensure that they are authorised to disclose that information to Rea and that, without taking any further steps required by applicable data protection or privacy laws, Rea may collect, use and disclose such information for the purposes described in this Privacy Policy.

7. Storage

- 7.1. All Personal Information will be stored on external, secure cloud hosted infrastructure. Additional individual access through the sites may be logged. This could include:

- Browse's internet address
- Servers address
- Domain name
- IP address
- Date and Time of the visit to the site
- The pages accessed and documents downloaded
- The type of browser used

- 7.2. We will keep your Personal Information:

- until we no longer have a valid reason for keeping it;
- until you request us to stop using it; or
- for as long as required by law (for example, we keep invoice information for 7 years to fulfil our tax obligations).

8. Use

- 8.1. We use the Personal Information that we collect so that we may pursue our legitimate business functions and activities (not overridden by your Personal Information protection interests or fundamental rights and freedoms). These interests include:

- To protect our interests and rights: Where required by law or where we believe it is necessary to protect our legal rights, interests, we may use Personal Information in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.
- Compliance: Compliance with our legal obligations, including any notification and reporting obligations and any access directions imposed on us by a government agency or regulatory authority.

We may also use Personal Information collected for such other purposes that are compatible with the original purpose described above, or that you otherwise consented to from time to time.

- 8.2. Personal Information collected by Rea will be held for the purposes of enrolling learners and administration. Other purposes may include reporting back to employer partners and funding partners, celebrating and recording learner achievement.
- 8.3. Staff members and other personnel within Rea will have access to learners Personal Information for purposes relevant to normal Rea operations including but not limited to: learner recruitment, marketing, admission, enrolment, progress, attendance, fees and charges, establishing and maintaining records and agreements (scholarship providers or sponsors, programme delivery partners).
- 8.4. Learners achievements i.e. graduation and employment are public record, and Rea can verify achievements to those who enquire. However, the specific details or individual components of a learners qualification will not be disclosed by Rea without the learners consent.
- 8.5. Rea will use anonymised information (including learning analytics) gained from Rea activities for marketing purposes, including research and to improve Programmes design and delivery. All possible precautions will be taken to ensure that Rea learners, past and present, will not be identifiable as individuals.
- 8.6. In addition, Rea will survey students for feedback on their experience. Rea will also ask learners to volunteer feedback and data (including videos and photographs) marketing purposes.

9. Disclosure

- 9.1. We may disclose your Personal Information to:
 - third parties who provide necessary services to us, including third parties who help us market and sell our Services - for instance to manage customer relations and send out newsletters;
 - any business that supports our Websites and Services, including hosting or maintaining any underlying IT system or data centre that we use to operate the Websites and Services;
 - a person who can require us to supply your Personal Information (e.g. a regulatory authority or law enforcement agency);
 - to respond to due diligence requests and/or transfer your Personal Information in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition of our business; and
 - any other person or entity authorised by you.

10. Overseas Transfers

- 10.1. We are located in New Zealand, so Personal Information may be transferred and/or stored there. Personal Information may be provided to our overseas third party service providers. These third parties do not have the right to use the Personal Information for their own use.

11. Security

- 11.1. We follow generally accepted industry standards to protect the Personal Information collected and processed by us, both during transmission and once we receive it.
- 11.2. We maintain appropriate administrative, technical and physical safeguards to protect Personal Information against accidental or unlawful destruction, loss, alteration and misuse. This includes, for example, firewalls, encryption Personal Information transfers, password protection (using ActiveCampaign and Airtable) and other access and authentication controls.
- 11.3. However, the internet is not a secure environment and we cannot give an absolute assurance that your Personal Information will be secure at all times. Transmission of Personal Information over the internet is at your own risk and you should only enter or instruct the entering of Personal Information to our Services within a secure environment.

12. Cookies

- 12.1. If you leave a comment on our Website you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

- 12.2. If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.
- 12.3. When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.
- 12.4. If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.
- 12.5. With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. If you want to do this, refer to your browser instructions or help screen to learn more. If you reject the use of cookies, you will still be able to access our Websites or Services but please note that some of its functions may not work as well as if cookies were enabled. To learn more about how to enable, edit, or disable cookies on your computer, please visit the aboutcookies.org website.

13. Web analytics

- 13.1. We use Google Analytics and Facebook Pixel to collect information about use of our Websites and Services, with the goal of improving our Websites and Services. Google Analytics and Facebook Pixel collect information such as how often you visit our Website or use the Services, what pages or features you visit when you do, and what other sites they used prior to coming to the Website.

14. Embedded content from other websites

- 14.1. Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.
- 14.2. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

15. Your consent and the rights you have over your Personal Information

- 15.1. By submitting your Personal Information to us, you consent to the use of that information accordance with this Privacy Policy.
- 15.2. You have the right to ask for a copy of any Personal Information we hold about you, and to ask for it to be corrected if you think it is wrong. We will respond to your request in accordance with the Privacy Act.
- 15.3. If you'd like to ask for a copy of your Personal Information, or to have it corrected, please [contact us](#) at info@rea.coach, or +64 9 884 0101.

16. Changes to this Privacy Policy

- 16.1. From time to time we may make changes to this Privacy Policy (for example, to reflect any changes in our business or any applicable data security laws). Where a change is significant, we will make sure we let you know – usually by displaying a notice on our Website.

Supporting legislation:

[Harmful Digital Communications Act 2015](#)

[Privacy Act 2020](#)