



The following Core Data Values reflect the approach ERANZ members aim to achieve in their management of customer data and when assessing whether, how and when to use and share data to bring about value and benefit for electricity customers and New Zealand.

The intention is to give customers confidence that their data is secure and being dealt with in an appropriate manner.

The values are applicable to, and intended to be voluntarily adopted by, ERANZ members.

➤ **Value 1: Privacy will be an objective at the highest levels within ERANZ members' organisations, and responsibilities for securing that objective will be clearly identified by each member.**

Guidance: ERANZ members should:

- Regularly review their customer data practices for compliance with these values.
- Ensure that an effective means of addressing customer concerns regarding customer data is available.
- Conduct regular training and ongoing awareness activities for relevant employees on their privacy policies and practices.

➤ **Value 2: Customer data will be managed in a way, as much as possible, that is open and transparent to customers so that they know that it is being collected, how it will be used, what the value is to them in sharing their data, and what their choices are in respect of their data.**

Guidance: ERANZ members should:

- Collect, use and disclose data consistently with their applicable privacy policies and privacy statements and the Privacy Act 1993.
- Notify customers as to the collection, storage and use of their data at pertinent times including if there is a substantial change in a procedure or service that may impact customer data.
- Notify customers as to how their customer data will be secured throughout its lifecycle and explain how the customer can exercise their choices regarding customer data.

➤ **Value 3: The primary purpose for the use of the data is to supply customers with electricity. Important secondary purposes may be to provide a benefit to customers, improving electricity retailer service or the services of the electricity sector as a whole.**

Guidance: Disclosures of customer data will be to support these purposes where possible.

- **Value 4: Before disclosing customer information, members will consider whether the purpose of disclosure can be satisfied by disclosing anonymised and aggregated data so as not to reveal identifiable personal information.**

Guidance: Aggregated data is a combination of data elements for multiple customers to create a data set that is sufficiently anonymous so that it does not reveal the identity of an individual customer. Anonymized Data is a data set containing individual sets of information where all identifiable characteristics and information, such as name, address, or account number, are removed so that an individual customer cannot reasonably be re-identified based on, for example, usage, rate class, or location.

- **Value 5: Clear disclosures about who will or may have access to identifiable customer data will be made, as much as possible.**

Guidance: Members are encouraged to have policies and statements that explain the circumstances under which they will share identifiable customer data, including circumstances where they will disclose data without first obtaining a customer's consent.

- **Value 6: Customer data will be stored securely.**

Guidance: ERANZ members will:

- Design and organise their security (including encryption) in accordance with recognised industry standards as appropriate to the nature of the data being held.
- Ensure any contractors and/or employees responsible for data storage and data security understand the applicable obligations.

- **Value 7: A comprehensive response programme will be maintained and if a data incident occurs, prompt steps will be taken to mitigate the impact of the incident and, where unauthorised access to personal information is likely to have occurred, consider notifying impacted customers and relevant authorities.**

Guidance:

- Data security incident response programmes will address the identification, mitigation and resolution of any incident that causes or results in the breach of customer data security.
- Members will consider notifying any incident on a case by case basis, taking into account factors such as the likelihood of unauthorised access, how certain the member can be of whose information has been compromised and the risk of harm.

- **Application**

The values are applicable to, and intended to be voluntarily adopted by, ERANZ members.

These Core Data Values do not affect an ERANZ member's obligations under the law. In particular, these Core Data Values do not:

- limit the principles of the Privacy Act 1993 or an ERANZ member's privacy policies, which ERANZ members will also comply with; or
- restrict any ERANZ member from doing (or not doing) anything it considers necessary for compliance with law or regulatory requirements, including the Privacy Act.