



FISA DATA PROTECTION AND CONFIDENTIALITY

1. Transparency International NZ (TINZ) collects information you submit through the **FISA Self-Assessment**. You give TINZ permission to use this information for the purposes of :
 - a. providing and improving the FISA Self-Assessment;
 - b. generating reports for individual participant organisations, that provide benchmarks for those participants against industry good practice, and against other relevant survey participants (in anonymised, aggregated form);
 - c. publishing anonymised information about the conduct and integrity of participants in New Zealand's financial markets;
 - d. for any reasonable incidental purposes (such as related research and quality assurance).

You agree that you cannot withdraw this permission.

2. TINZ will only disclose your **FISA Self-Assessment** information in an anonymised form, subject to paragraphs 3(a) – (c) below. Typically, this means that before your information is disclosed it is combined with that of other **FISA Self-Assessment** participants, and only published in an aggregate form that does not identify you. In other cases, TINZ may publish verbatim comments you have included in the **FISA Self-Assessment** without attributing these to you.
3. TINZ will keep your **FISA Self-Assessment** information confidential, except that TINZ may disclose this information:
 - a. In an individual report to you;
 - b. To any organisation that you approve it to be provided;
 - c. In an aggregated/anonymised form, as described in paragraph **Error! Reference source not found.** above;
 - d. With your express written permission; and/or
 - e. Where required by law or a governmental authority.
4. TINZ will hold your **FISA Self-Assessment** information subject to reasonable safeguards against loss, and unauthorised access, disclosure, modification and use. Discrimen/Survey Analytics will be the sole repository of the detailed information. Detailed and identifying data will not be replicated on TINZ IT systems. Aggregated data may be kept on TINZ' information systems, or by contractors, subject to confidentiality agreements.

5. TINZ will delete your **FISA Self-Assessment** information after no more than [5] years, but may indefinitely retain any anonymised information or insights that are derived from this information.
6. On behalf of TINZ, Discrimen Limited (“Discrimen”) licences software from QuestionPro, Inc (“QuestionPro”) to help make the **FISA Self-Assessment** available to you. QuestionPro is a subsidiary of Survey Analytics LLC (“Survey Analytics”). Discrimen, QuestionPro and/or Survey Analytics may collect, use and hold **FISA Self-Assessment** information for the purpose of making the **FISA Self-Assessment** available to you, and for any other relevant purposes described in this Appendix, on behalf of TINZ. [Survey Analytics is certified under the U.S. Department of Commerce's Safe Harbor Programme. That designation certifies that Survey Analytics conducts business in compliance with European privacy laws, which impose requirements typically the same as or stricter with respect to personal information than those currently applying under the Privacy Act 2020.] Information held by Discrimen, QuestionPro and/or Survey Analytics is stored at rest in Internap Network Services’ data centres in the USA.
7. If any of the information you submit through the **FISA Self-Assessment** contains personal information (as defined in the Privacy Act 2020), the individual to whom the information relates may request access to and/or correction of that information from TINZ by emailing fisa@tinz.org.nz or PO Box 10123, Wellington, 6140. More information about individuals’ rights under the Privacy Act 2020 can be found on [the Privacy Commissioner’s website](#).