

Privacy Policy

worktheoryco.online · March 2026

Your privacy matters to us. This Privacy Policy explains how WorkTheory Co. collects, uses, stores, and protects your personal information — and what rights you have under New Zealand law.

Last updated: March 2026

1. Who We Are

1.1 WorkTheory Co. is a trading name operated by Phillipa Gimmillaro, a sole trader based in Auckland, New Zealand. We provide fractional HR, people strategy, coaching, and consulting services to New Zealand organisations.

1.2 For the purposes of the Privacy Act 2020 (NZ), we are the agency responsible for the personal information we collect. Our Privacy Officer can be contacted at hello@worktheory.co.nz.

2. What This Policy Covers

2.1 This policy applies to personal information collected through:

- (a) our website at worktheoryco.online;
- (b) direct enquiries, email, or phone contact;
- (c) the delivery of our consulting and advisory services; and
- (d) any other interactions you have with WorkTheory Co.

3. Personal Information We Collect

3.1 We collect personal information only where it is reasonably necessary for the purposes described in this policy. The types of personal information we may collect include:

- (a) **Contact details** — name, email address, phone number, job title, and organisation name;
- (b) **Business information** — details about your organisation, team structure, or HR challenges relevant to the services we provide;
- (c) **Sensitive information** — where relevant to an engagement, information about individuals in your workforce (e.g., employment history, performance matters, health and safety matters). We handle such information with particular care;
- (d) **Website usage data** — including IP address, browser type, pages visited, and time spent on the site, collected via cookies or analytics tools; and

(e) **Communications** — records of correspondence and notes from meetings or consultations.

3.2 We collect personal information directly from individuals where practicable, in accordance with Information Privacy Principle 2 of the Privacy Act 2020.

3.3 We will not collect personal information by unlawful or unfair means.

4. How We Use Your Personal Information

4.1 We use personal information for the purposes for which it was collected, including:

- (a) delivering our consulting, advisory, and coaching services;
- (b) communicating with you about our services, enquiries, or engagements;
- (c) sending relevant service updates or resources (with your consent where required);
- (d) maintaining business and financial records; and
- (e) meeting our obligations under applicable law, including the Privacy Act 2020, Employment Relations Act 2000, and Health and Safety at Work Act 2015.

4.2 We will not use personal information for any purpose that would be incompatible with the purpose for which it was collected without your consent.

5. Disclosure of Personal Information

5.1 We treat your personal information with confidentiality. We do not sell or rent personal information to third parties.

5.2 We may share personal information with trusted third parties who assist us in operating our business, including:

- (a) cloud service and software providers (e.g. email platforms, accounting software, document storage) — subject to data processing agreements;
- (b) professional advisers (e.g. accountants, legal counsel) where necessary; and
- (c) government agencies or regulators where required by law.

5.3 Where we share personal information with third parties, we take reasonable steps to ensure those parties protect that information consistently with this policy and the Privacy Act 2020.

5.4 **Trans-border disclosure.** Some third-party service providers may be located outside New Zealand. Where personal information is transferred offshore, we take reasonable steps to ensure it receives comparable protections to those required under the Privacy Act 2020, in accordance with Information Privacy Principle 12.

6. Cookies and Website Analytics

6.1 Our website may use cookies and similar tracking technologies to improve your browsing experience and help us understand how the site is used.

6.2 You can control or disable cookies through your browser settings. Note that disabling cookies may affect the functionality of the Website.

6.3 We may use third-party analytics tools (such as Google Analytics) to collect aggregated, anonymised data about site usage. This data is used to improve our Website and services.

7. Storage and Security

7.1 We take reasonable security measures to protect personal information from unauthorised access, disclosure, alteration, or destruction. These include password protection, encryption where appropriate, and access controls.

7.2 Despite our best efforts, no method of electronic transmission or storage is completely secure. We cannot guarantee absolute security.

7.3 We retain personal information only for as long as is necessary for the purposes for which it was collected, or as required by law. As a general guide: client contact and business records are retained for 7 years following the end of an engagement (consistent with financial record-keeping requirements); website analytics data is retained for up to 26 months; and other personal information is reviewed annually and deleted or de-identified when no longer needed. When information is no longer required, we securely destroy or de-identify it.

8. Notifiable Privacy Breaches

8.1 Under the Privacy Act 2020, we are required to notify the Privacy Commissioner and affected individuals of any privacy breach that is likely to cause serious harm.

8.2 We have internal procedures to identify, assess, and respond to privacy breaches promptly. If you believe a privacy breach has occurred involving your information, please contact us immediately at hello@worktheory.co.nz.

9. Your Rights

9.1 Under the Privacy Act 2020, you have the right to:

- (a) **Access** the personal information we hold about you (Information Privacy Principle 6);
- (b) **Correct** any personal information we hold about you that is inaccurate, misleading, or not current (Information Privacy Principle 7); and
- (c) **Request deletion** of personal information in certain circumstances.

9.2 To exercise these rights, please contact our Privacy Officer at hello@worktheory.co.nz. We will respond within 20 working days as required by law.

9.3 If you are not satisfied with our response, you may make a complaint to the Office of the Privacy Commissioner at www.privacy.org.nz or on freephone 0800 803 909.

10. Marketing Communications

10.1 We may send you information about our services, events, or resources where you have opted in or where we have a legitimate interest to do so under the Unsolicited Electronic Messages Act 2007.

10.2 You can unsubscribe from marketing communications at any time by contacting us at hello@worktheory.co.nz or by clicking the unsubscribe link in any email we send you.

11. Updates to This Policy

11.1 We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. The current version is always available on our website at worktheoryco.online.

12. Contact Us

If you have any questions about this Privacy Policy or how we handle your personal information, please contact us:

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| Privacy Officer | WorkTheory Co. |
| Email | hello@worktheory.co.nz |
| Website | worktheoryco.online |
| Location | Auckland, New Zealand (national coverage) |

How We Work

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| Relationships | We believe good work is built on genuine connection. We take time to understand the people and organisations we work with and we show up as a real partner. |
| With People | Inclusion is a core design feature. It is about creating spaces where people feel valued, respected and empowered. Accessibility ensures nothing gets in the way. |
| For Good | We do the right thing, we own the impact of our work, and we think about the long game. That means honest advice even when it's hard, building genuine capability not dependency, and making responsible decisions — about people, governance, and the future of work we're helping to shape in New Zealand. |

We believe strong relationships are built on trust — and trust starts with being transparent about how we look after your information.

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