



## **Biometric Privacy Compliance Statement**

*(Biometric Processing Privacy Code 2025 – New Zealand)*

**Effective date:** 3 November 2025

**Compliance status:** Confirmed for all biometric processing undertaken by Realaml

**Full compliance deadline for existing systems:** 3 August 2026

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### **1. Purpose of this Statement**

This statement confirms that Realaml Limited (“Realaml”, “we”, “our”) complies with the **Biometric Processing Privacy Code 2025** issued under the **Privacy Act 2020**. The Code regulates how biometric information (such as facial images or voice patterns) is collected, used, and protected in New Zealand.

Our aim is to assure you—our clients and partners—that all biometric processing performed by Realaml is lawful, necessary, proportionate, and respectful of individual privacy, in line with both the Privacy Act and the Code.

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### **2. Scope of Biometric Processing**

Realaml uses biometric technology for the following purposes:

- **Identity verification** – Matching a live image/video or other biometric sample to an official identity document to confirm a person’s claimed identity.
- **Fraud prevention** – Detecting and preventing identity fraud, including “liveness” checks to ensure the sample is from a real person present at the time.
- **Regulatory compliance** – Meeting AML/CFT and other applicable legal obligations.

We **do not** use biometric information for unrelated profiling, marketing, or inferring personal traits such as ethnicity, gender, age, emotional state, or health status, unless explicitly required by law.

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### 3. Collection & Notification

Before biometric data is collected, individuals are clearly informed:

- That biometric processing will occur.
- Why it is necessary and lawful.
- What alternatives (if any) are available.
- Who will receive the biometric information.
- How long it will be retained.
- How to request access, correction, or deletion.
- How to make a complaint to us or to the Office of the Privacy Commissioner.
- That a **summary of our Rule 1 assessment** (necessity, proportionality, safeguards) is available on request.

This information is provided in our Privacy Notice, displayed at the point of collection, and available at: **[Insert Link]**.

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### 4. Safeguards & Security

We apply reasonable and appropriate technical, physical, and organisational measures to protect biometric information, including:

- Encryption in transit and at rest.
  - Role-based access controls and audit trails.
  - Automatic deletion of biometric templates and samples once no longer needed for the stated purpose.
  - Regular security testing and monitoring.
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## 5. Individual Rights

Under the Code and the Privacy Act, individuals can:

- Confirm whether we hold their biometric information.
- Access that information and request correction or deletion.
- Attach a statement of correction if we do not agree to amend.
- Withdraw consent where applicable (subject to legal/regulatory requirements).

Requests can be made via: **[Insert Contact Email/Portal]**.

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## 6. Overseas Processing

Where biometric data is processed outside New Zealand, we only do so where:

- The destination country provides comparable privacy safeguards; or
  - We have contractual protections that meet **Rule 12** of the Code.
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## 7. Cultural Considerations

Realaml considers potential cultural impacts—particularly for Māori—before introducing or materially changing biometric processing systems.

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## 8. Governance & Accountability

- A **Rule 1 assessment** is completed and kept on file for all biometric systems.
  - We review biometric processes regularly to ensure ongoing compliance with the Code.
  - Our staff are trained in privacy and biometric-specific obligations.
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## 9. Scope Exceptions

The Biometric Processing Privacy Code 2025 does **not** apply to:

- Biometric processing by **health agencies** for health information (covered by the Health Information Privacy Code).
- Biometric processing by **intelligence and security agencies** under their specific legislative frameworks.
- Use of biometric features in **consumer devices** for purely personal use (e.g., unlocking a smartphone).

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## 10. Contact & Complaints

**Privacy Officer – Realaml Limited**

Email: [jordan@realaml.com](mailto:jordan@realaml.com)

Phone: **+64 4 889 4788**

Address: **Colin Groves, 201a Airport Road, Ohaupo, 3282 , New Zealand**

If you are not satisfied with our response to a privacy concern, you may contact the **Office of the Privacy Commissioner** at [www.privacy.org.nz](http://www.privacy.org.nz).

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### Signed:

Jordan McCown  
Chief Executive Officer  
Realaml Limited  
Date: 13 / 08 / 2025