

Business Connect Customer Data Retention Policy

Shared services approach

The Business Connect platform is currently delivered via a 'shared services' approach. The approach enables a contractual relationship between:

- a Host Agency (MBIE), who is responsible for contracting, hosting and maintaining the Platform.
- the primary service provider (Datacom), who builds, hosts and maintains the Platform on behalf of the Host Agency.
- Government Service Providers (GSPs), local councils or central agencies who own the services being enabled via the Platform.

The Host Agency enforces rights and obligations via their contract with the primary service provider (for example in relation to the management of personal information) on behalf of the GSPs.

GSP responsibilities for Customer Data

Customer Data is defined as that information contained in submitted applications as part of a specific service being enabled on the Platform.

The data an end user enters is not visible to a government organisation until it is submitted. Councils and agencies (GSPs) cannot access data with the status 'draft' in any way.

Once submitted to them, GSPs are responsible and liable under the Privacy Act 2020 for the handling of all information (Customer Data) via the Business Connect platform.

Business Connect is not designed to be the system of record for government services. For this reason, GSPs must ensure that they move any Customer Data to their own backend systems. In addition, GSPs will need to set a data retention period for the information that has been submitted for their service via the Business Connect platform.

The retention period should take account of any possible permit, licence or registration renewal to allow contingency so users can reuse their Customer Data.

Process for stipulating data retention period

- As part of the service onboarding, GSPs will be required to complete a Business Connect Customer Data Retention Form. The form will ask them to stipulate a storage period for their Customer Data.
- The Business Connect platform will then retain Customer Data for that period starting from the submission date.
- GSPs take full responsibility for ensuring Customer Data is securely stored in the system of record before the expiration of the data retention period to fulfil their legal obligations and guarantee their continued access to that data.



- Customer Data will be retained on Business Connect for a minimum of 16 months to satisfy basic reporting requirements (i.e. case volumes, case types and uptake of services).
- Once the data retention period has ended the data will be irrevocably deleted from the Business Connect Platform for both the GSP and end user. Only a log entry and audit history reflecting the delivery details of that data will be retained to ensure our provider is able to demonstrate it has satisfied contractual obligations. The data held in the log entry includes date and time of submission, service name, GSP name, Case ID and NZBN.
- The original audit entries reflecting who created the application, when it was created and who approved it will also be retained.
- The end user will not be notified and will not be required to take any action when the data retention period is complete and their data is deleted.

Options for receiving Customer Data

There are several options offered to GSPs for receiving Customer Data as part of the process for onboarding their service. The options include:

- receiving service submissions via email to a nominated inbox
- downloading bulk data
- using a cloud-based case management admin portal
- consuming APIs to deposit data directly into their backend system.

As previously stated, Business Connect is not a system of record and councils and agencies must ensure that they move any Customer Data they are choosing to retain to their own backend systems.

What data is Business Connect responsible for?

The Business Connect platform will only retain data for as long as it is required for the purposes for which it may lawfully be used. Business Connect stores public records (which can include personal information) in accordance with the Public Records Act 2005. The only data MBIE is responsible for, privy to and manages, is the Platform Usage and Customer Profile Data.

Glossary	
GSP (Government Service Provider)	Government Service Providers (councils and agencies using the Business Connect platform).
Customer Data	Information contained in submitted applications as part of a specific service being enabled on the Platform. Can include name, contact details, date of birth, business and banking details.
End Users	End users are business customers using the services on the Business Connect platform.
Platform Usage Data	Statistics about how the platform is being used, including the devices, approximate locations, and navigation patterns, peak usage times, does not include personal information.
Customer Profile Data	Four data fields required to create a Business Connect account; first name, last name, phone number, verified email address.