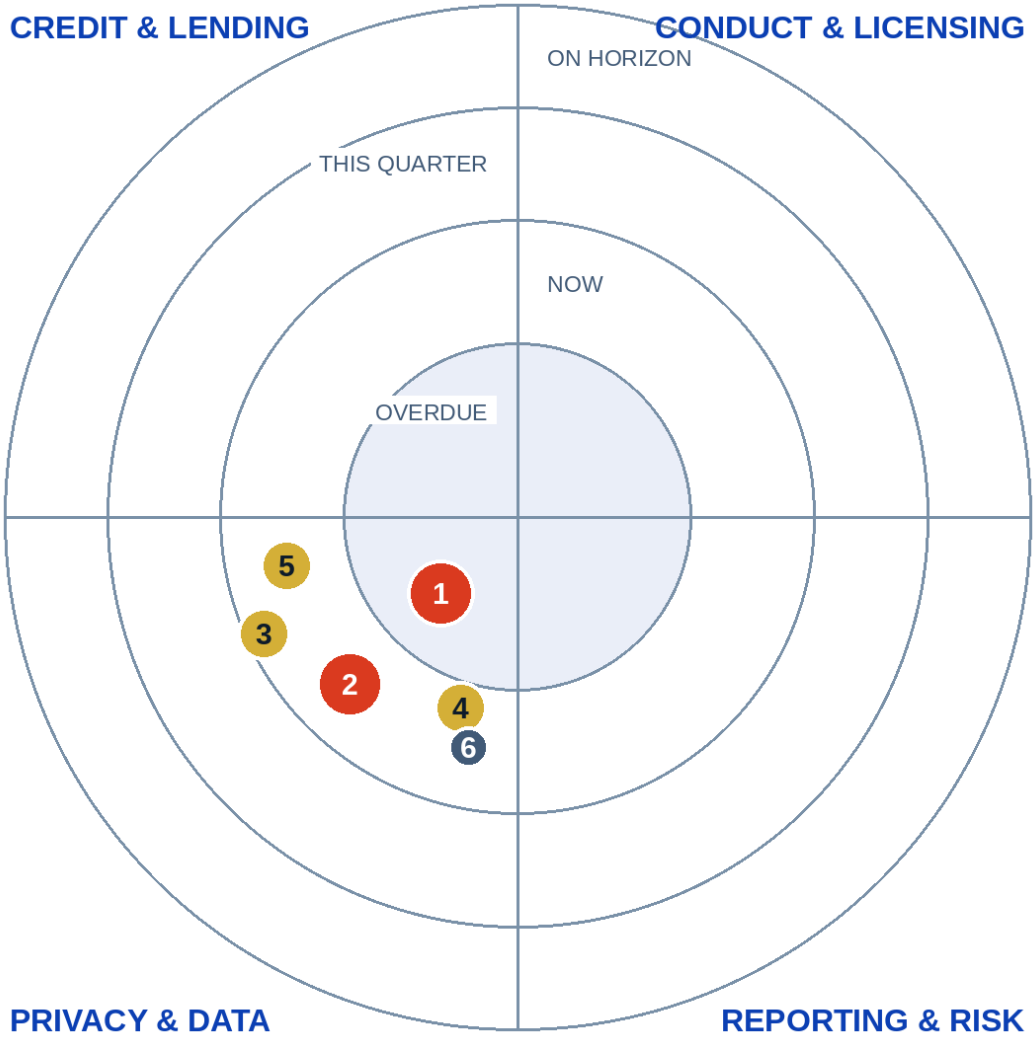
DARK ARTS
EVENT HORIZON

REGULATORY RADAR
NZ PRIVACY & DATA
SEPTEMBER-OCTOBER 2026

What's moving on the horizon for these firms and what it quietly breaks.

LEAD SIGNALS

The Manage My Health final report turns dormant accounts and breach response into findings, and the Commissioner says every agency should take note. Indirect collection rules have applied since May, so third-party data collected since then is already in scope.



ANGLE = CATEGORY · DISTANCE FROM CENTRE = WHEN IT BITES · SIZE & COLOUR = SEVERITY

1 **PRIVACY & DATA** · OVERDUE **HIGH**

Indirect collection rules started in May

WHO: any agency collecting personal information about people from someone other than the person

WHAT: data feeds from third parties that never trigger a notice to the person they describe

WHEN: Applies to personal information collected since 1 May 2026. Everything collected indirectly since then is already in scope.

SOURCE: legislation.govt.nz

2 **PRIVACY & DATA** · NOW **HIGH**

Dormant accounts became a breach finding

WHO: any agency running customer accounts, portals or apps

WHAT: customer platforms with no process to check in on, close or purge accounts nobody uses

WHEN: Final report released 30 October. The Commissioner generally expects a check-in after 12 months of inactivity.

SOURCE: privacy.org.nz

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3 **PRIVACY & DATA** · NOW **MEDIUM**

Breach notified six months late

WHO: any agency whose security incidents are handled by IT or an outside provider

WHAT: incident response that treats cyber and privacy separately, so nobody asks whether to notify

WHEN: Decision published. The Commissioner expects notification within 72 hours of knowing a breach is notifiable.

SOURCE: privacy.org.nz

4 **PRIVACY & DATA** · NOW **MEDIUM**

Overseas policy, New Zealand problem

WHO: New Zealand businesses using a parent company's privacy policy

WHAT: collection notices and privacy policies inherited from a parent company that cite foreign law

WHEN: Decision published. The Commissioner signals targeted adverse comment, including to parent companies, when firms do not engage.

SOURCE: privacy.org.nz

5 **PRIVACY & DATA** · NOW **MEDIUM**

Boards must know where AI runs

WHO: privacy and security teams at regulated financial firms

WHAT: AI use nobody has inventoried: vendor features, staff tools and code assistants outside the risk register

WHEN: Expectations already published. Boards and senior managers should know where AI is deployed and who owns the risk.

SOURCE: fma.govt.nz

6 **PRIVACY & DATA** · NOW **LOW**

Personal emails on work systems count

WHO: any employer responding to access requests from staff or former staff

WHAT: access-request processes that skip personal email held in company mailboxes

WHEN: Case note published. Personal emails held on work systems can fall inside an access request.

SOURCE: privacy.org.nz

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