

Submission on discussion document: *Publication of Directors' Residential Addresses on the Companies Register*

Your name and organisation

Name	Gerd Diegelmann
Organisation	Simuserv Pty Ltd

Please select if your submission contains confidential information:

I would like my submission (or specified parts of my submission) to be kept confidential, and attach my reasons for this for consideration by MBIE.

Responses to discussion document questions

1	Do you have any comments of our assessment of the options for approaching directors' residential addresses on the Companies Register?
	Allow all directors to have an address for service to be published in lieu of their residential address.
2	What is your preferred option?
	Allow all directors to have an address for service to be published in lieu of their residential address.
3	Are there interested parties who may have a legitimate reason to need to access directors' residential addresses? If so, who?
	I do not believe that this is necessary. The significant right of individuals of protection of their personal data overrides a one-size-fits all openness with very little tangible benefit to the public as a whole.
4	Is there a public interest in directors' residential addresses being provided to third parties such as journalists?
	These personal details should only be provided if there is a court order or with the consent of the director.
5	Under what circumstances should directors' residential addresses be released to an interested party?

	As above, only by court order or with the consent of the director.
6	Do you agree that government departments and agencies should have automatic access to directors' residential addresses?
	Yes, this can be possible if the agency can prove legitimate reason.
7	Should this access be limited to the enforcement of law or are there other situations where it may be appropriate for government departments and agencies to have access to directors' residential addresses?
	Government agencies which have a legitimate interest should have access.
8	Are there other factors which you think should be included in considering approaches to directors' residential addresses in historic documents?
	Residential addresses should not make public in any form without consent or a court order.
9	Do you agree with our preferred approach to historic documents on the companies register?
	Residential addresses should not make public in any form without consent or a court order.
10	Have you encountered situations where you consider that members of the public have abused this provision? If so, please provide details.
	NA
11	Do you agree that shareholders' residential addresses should be treated the same way as directors' residential addresses (ie replaced with an address for service)?
	Yes.
12	Are there circumstances where third parties might have a legitimate interest in the residential address of a shareholder?
	Yes, but only a court should determine if this is legitimate.
13	Do you think any changes need to be made to the residential address requirements for officers of other types of entities?

Other comments