NZSUPERFUND
Te Kaitiaki Tahua Penihana
Kaumātua o Aotearoa

13 November 2026

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[redacted]

Victoria University of Wellington

By email

Dear [redacted]

Official information request regarding off-site storage of hard copy and digital information

I refer to your official information request to the Guardians of New Zealand Superannuation ("**Guardians**") dated 11 October 2026 regarding how much public sector organisations are spending on off-site storage of hard copy and digital information. Your stated purpose in receiving this information is not only to provide accountability for how public money is being spent, but to enable informed public participation in debate on the funding of the records and information management functions of government, and the cost-drivers of compliance with other laws such as the Official Information Act and Privacy Act.

In our conversation of 15 October 2026 you clarified the scope of your request, noting that we could limit our response to the Guardians' approved records management systems, being eDocs and SharePoint; and any other provider involving expenditure of $100,000 or more p.a. for off-site or cloud storage. You confirmed that our HR system Oracle was outside the scope of the request.

Our responses to your questions are set out below.

1. The names of all the companies that have provided off-site storage facilities of hard copy records and information for the Guardians of New Zealand Superannuation since 1 July 2021.

Iron Mountain (formerly Recall).

2. The names of all the companies that have provided off-site or cloud storage facilities of digital records, information or data for the Guardians of New Zealand Superannuation since 1 July 2021.

Microsoft.

3. A copy of the contract(s) the Guardians of New Zealand Superannuation has, or has had, with each of the companies listed in your responses to parts 1 and 2 above for the period since 1 July 2021.

We have released copies of these contracts at Appendix 1. Some information has been withheld under the following sections of the Act:

- Section 6(c) as making the information available would be likely to prejudice the maintenance of the law, including the prevention, investigation and detection of offences. This applies to certain

invoice information and bank account details, which could be used to facilitate fraud, including invoice fraud.

- Section 9(2)(a), to protect the privacy of natural persons. This applies to signatures of individuals.
- Section 9(2)(b)(ii), to protect information where release would be likely unreasonably to prejudice the commercial position of the person who supplied it. This applies to unit pricing, discount rates and pricing thresholds negotiated and to pricing in the Discount Transparency Disclosure Forms.
- Section 9(2)(ba)(i), to protect information subject to an obligation of confidence, where release would be likely to prejudice the supply of similar information in the future. This applies to a customer-specific discount provided.
- Section 9(2)(j), to enable the Crown to carry on negotiations without prejudice or disadvantage. Release of all-of-government pricing and discount structures would be likely to weaken the Crown's position in future negotiations with Microsoft.
- Section 9(2)(k), to prevent the use of official information for improper gain or improper advantage. This applies to an internal operational email address that could be targeted for phishing.

We have considered the public interest in releasing this information and do not consider it overrides the rationale for withholding it as outlined above.

The details of the contracts we are releasing to you are set out below:

Document name	**Details**	**Decision**
Guardians of New Zealand Superannuation - Contract SDS CR 00026880 (form CR-98106)	Contract with Recall for secure collection and destruction of confidential documents and media. Contract start date 14-01-2004.	Partially released. Signatures of Guardians and Recall staff have been withheld based on section 9(2)(a) of the Act.
RCM01129 - NZ- 123900 New Zealand Superannuation Fund - 04 03 2006 DCU056 1106	Contract Document Cover Sheet. New agreement start date 3 April 2006.	Partially released. Signatures of Guardians and Recall staff have been withheld based on section 9(2)(a) of the Act.
The Sovereign in Right of New Zealand - MCSSA - MoU - 2018	Memorandum of Understanding between the Department of Internal Affairs, as Lead Agency, and Guardians. Enables purchase of Microsoft products and services under the 2018 Microsoft Cloud, Software and Services Agreement and sets out the governance, reporting, confidentiality, security and administration arrangements. Signed 27 September 2018.	Partially released. Signatures have been withheld based on section 9(2)(a) of the Act.
MCSSA EA 2018	Microsoft Enterprise Agreement setting out the licensing framework for Microsoft software and Online Services ordered by Guardians through an enrolment, including licence rights, Software Assurance, use	Released in full.

	rights, term, termination and administration	
Schedules to Master Agreement 2018	Schedules to the 2018 MCSSA. Includes amendments applying the Microsoft Enterprise Agreement, Enterprise Enrollment, Enterprise Subscription Enrollment and Server and Cloud Enrollment to eligible New Zealand government agencies, together with applicable pricing, enrolment and governance terms.	Partially released. Certain information has been withheld based on section 9(2)(b)(ii) of the Act.
Microsoft Cloud, Software and Services Agreement - 7-Q5UKRDK6T - Countersigned by Microsoft - July 2018	All-of-Government Microsoft Cloud, Software and Services Agreement between the Department of Internal Affairs and Microsoft Operations Pte Ltd. Establishes the contractual framework under which eligible New Zealand government agencies may purchase Microsoft software, Online Services and professional services under Affiliate Agreements. Effective 5 July 2018.	Partially released. Signatures have been withheld based on section 9(2)(a) of the Act.
20240916 [Fully] Microsoft Cloud Agreement MOU - The Sovereign in Right of New Zealand	Memorandum of Understanding between the Department of Internal Affairs, as Lead Agency, and Guardians. Enables purchase of services under the 2024 MCSSA and sets out the governance, reporting, confidentiality, security and administration arrangements. Guardians signed 23 September 2024.	Partially released. Signatures have been withheld based on section 9(2)(a) of the Act. An internal-only operational email address has also been withheld based on section 9(2)(k) of the Act.
MCSSA Amendment 2021	Amendments to the Microsoft Cloud, Software and Services Agreement.	Partially released. Certain information has been withheld based on sections 9(2)(b)(ii) and 9(2)(j) of the Act.
Microsoft_Datacom_ PKG00122930_ 73048190 _ NZSF signed _ 24 09 2024	Microsoft Enterprise Subscription Enrollment 73048190 for Microsoft 365 and associated Online Services.	Partially released. Certain information has been withheld based on sections 9(2)(b)(ii) and 9(2)(j) of the Act.

(Microsoft affiliate agreement - Cloud based services)	Includes Program Signature Form; Enterprise Subscription Enrollment (Indirect); Discount Transparency Disclosure Form; Enterprise Subscription Amendment; Product Selection Form. Signed 24 September 2024.	
Microsoft_Datacom_ PKG04361036_ 59500114_ NZSF signed _ 24 09 2024 *(Microsoft affiliate agreement - M365 Office products)*	Microsoft Enterprise Enrollment 59500114 for Microsoft server and software licensing, Software Assurance and Azure services. Includes Program Signature Form; Enterprise Enrollment (Indirect); Enterprise Amendment; Product Selection Form; Discount Transparency Disclosure Form. Signed 24 September 2024.	Partially released. Certain information has been withheld based on sections 9(2)(ba)(i) and 9(2)(b)(ii) of the Act.

4. Copies of all invoices to the Guardians of New Zealand Superannuation from the companies listed in your responses to parts 1 and 2 above for the period 1 July 2024 to 30 June 2026. If you believe the public interest in disclosure does not outweigh any reason for withholding in the OIA, then please provide totals for each of the two financial years for each type of activity the companies charge the Guardians of New Zealand Superannuation for, including retrieval, re-filing, transportation, storage, digitisation, etc.

Invoices from Iron Mountain

We have released copies of invoices from Iron Mountain to you at Appendix 2. Some information contained within these invoices has been redacted. We have withheld this information because we are concerned that making it available could facilitate invoice fraud. The applicable withholding ground is section 6c of the Act, which provides for information to be withheld on the basis that making it available would be likely to prejudice the maintenance of the law, including the prevention, investigation and detection of offences. Based on our discussion with you of 15 October, we believe this information is not pertinent to your enquiry. We have considered the public interest in releasing this information and do not consider it overrides the rationale for withholding it as outlined above.

Invoices from Datacom for Microsoft products and services

The cloud-based storage we purchase from Microsoft is based on an initial standard 1TB plus an extra 10GB per user licence. We are currently at 86% of our allocated storage. These costs are not broken out; they are standard inclusions in the overall cost of using Microsoft 365. We are therefore declining your request for this information on the basis under section 18(g) of the Act, in that the information is not held. However, in the interests of transparency, we are disclosing copies of the invoices. We have withheld certain information in each of these invoices under sections 6(c) for the reasons stated above, as well as under section 9(2)(b)(ii), owing to the commercial sensitivity of the pricing information.

5. The quantity of physical records stored at the off-site storage facilities of each company listed in your answer to part 1 above, as of 1 July for each year since 30 June 2021, and whether this is measured in linear metres of shelving, numbers of storage containers (please state the dimensions of them), or a count of the individual files held. Please specify if the answer for each year is for the calendar year or financial

year. If there is no annual total (perhaps because of movements of files back to your offices, or disposals), but information about the quantities is held for periods throughout the year, please provide this information.

Date	**Quantity** (the number of storage containers; each container is approximately 419mm x 368mm x 305mm)
FY commencing 1 July 2021	591
FY commencing 1 July 2022	591
FY commencing 1 July 2023	591
FY commencing 1 July 2024	454
FY commencing 1 July 2025	399
FY commencing 1 July 2026	465

6. The size (in gigabytes or terabytes), and number, of digital records stored at the offsite or cloud storage facilities of each company listed in your answer to part 2 above, as of 1 July for each year since 30 June 2021, excluding daily/weekly/monthly backups, so that the information provided relates only to digital files identified for permanent retention or which have not been assessed for disposal or retention. If the size of the off-site storage is quantified in another way, please specify how and provide the figures according to that measure. Please specify if the answer for each year is for the calendar year or financial year. If there is no annual total, but information about the quantities is held for periods throughout the year, please provide this information.

Date	**Size of digital records identified for permanent retention or which have not been assessed for disposal or retention**	**Number of digital records identified for permanent retention or which have not be assessed for disposal or retention**
FY commencing 1 July 2021	Not held	Not held
FY commencing 1 July 2022	Not held	Not held
FY commencing 1 July 2023	Not held	Not held
FY commencing 1 July 2024	Not held	In September 2024 3.127 million documents and emails were migrated from our legacy information management system eDocs to Microsoft SharePoint. In October 2024 retention labels were applied to all records in SharePoint except those migrated from eDocs as they are yet to be sentenced against the authorised Disposal Authority. Of the sentenced records, 37,946 (78.3 GB) have been identified for permanent retention.
FY commencing 1 July 2025	Not held	Total number of digital records 3,666,819. Of these, 37,946 have been identified for permanent retention. The 3.127 million documents and emails that were migrated from eDocs into SharePoint are yet to be sentenced. The remaining documents have been sentenced and will be disposed when their retention period expires.

Date	Size of digital records identified for permanent retention or which have not been assessed for disposal or retention	Number of digital records identified for permanent retention or which have not be assessed for disposal or retention
FY commencing 1 July 2026	Total SharePoint storage used 5 TB	3,776,100 digital records.

7. The quantity (both numbers of files and of storage volume) of hard copy and digital records held which would have been transferred to Archives NZ (they have been identified as needing to be permanently retained under a retention and disposal schedule), but for an embargo or block on transfers to Archives NZ.

Nil. The requirement for the Guardians to transfer records to Archives NZ commences in 2027.

8. The quantity (both numbers of files and of storage volume) of hard copy and digital records held which are due for destruction, but still held due to lack of ability to verify eligibility for destruction, and any estimate of the cost of undertaking such verification and destruction held by the Guardians of New Zealand Superannuation.

Hard copy records – Nil. Those records which have completed their minimum retention period are being held due to ongoing business need.

The digital records migrated from the legacy EDRMS system are all held while the correct disposal sentence is assigned. This is an active project. Note: The Guardians obtained Disposal Authority approval from Archives NZ in November 2025.

9. The date and volume of the last two transfers of physical files from the Guardians of New Zealand Superannuation to Archives NZ.

Nil. The requirement for the Guardians to transfer records to Archives NZ commences in 2027.

10. The date and volume of the last two transfers of digital files from the Guardians of New Zealand Superannuation to Archives NZ.

Nil. The requirement for the Guardians to transfer records to Archives NZ commences in 2027.

11. The product name(s) and manufacturer name(s) of the software product(s) used by the Guardians of New Zealand Superannuation to store its 'public records' as that term is defined in section 4 of the Public Records Act 2005.

Microsoft Corporation; Microsoft SharePoint.

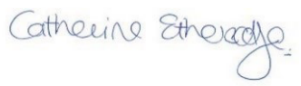
Use if granting the request in part and releasing information immediately

We have withheld certain information on the basis that we have good reason for doing so under section 9 of the OIA. We considered whether the public interest in favour of disclosure outweighs our reasons for withholding such information and concluded that it does not.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that it is our policy to proactively release our responses to official information requests where we consider the request to be a material one. Our response to your request will be published shortly at https://www.nzsuperfund.nz/publications/disclosures/oia/, with your personal information removed.

Yours sincerely



Catherine Etheredge

Head of Communications