

DACREED PRIVACY POLICY

1) Introduction

Dacreed Holdings Limited Partnership (“we”, “us”, “our”) complies with the New Zealand Privacy Act 1993 (the “Act”) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

When you visit our website <http://www.dacreed.com> (the “Website”), and more generally, use any of our services (the “Services”, which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Services immediately.

This privacy policy applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events.

Please read this privacy policy carefully as it will help you understand what we do with the information that we collect.

This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see www.privacy.org.nz.

2) Changes to this policy

We may change this policy by uploading a revised policy onto the Website. The change will apply from the date that we upload the revised policy.

3) What information we collect

a) Personal information you disclose to us

We collect personal information that you voluntarily provide to us including via the Website and any related service, through any registration or subscription process, through any contact with us (e.g. telephone call or email), or when you buy or use our Services and products, or express an interest in obtaining information about us or our products and Services, or when you participate in activities on the Website (such as by posting messages in our web application or entering competitions, contests or giveaways) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the products and features you use. The personal information provided by you that we collect may include the following: names; phone numbers; email addresses; mailing addresses; job titles; usernames; passwords; contact preferences; contact or authentication data; billing addresses; current employment information; comments and feedback; interests and communication preferences; and other similar information.

b) Information automatically collected

We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about when you use our Website, content you viewed or searched for and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use).
- **Device Data.** We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model, internet service provider and/or mobile carrier, operating system configuration information.
- **Location Data.** We collect information data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the Website.

4) How we use your personal information

We use personal information collected via our Website for a variety of business purposes set out below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations.

We use your personal information:

- to verify your identity
- to facilitate account creation and login
- to manage user accounts
- to send administrative information to you
- to provide Services and products to you
- to market our Services and products to you, or other products and services from third parties, including contacting you electronically (e.g. by text or email for this purpose)
- to improve the Services and products that we provide to you
- to enable user-to-user communications with each user's consent
- to post testimonials on our Website with your consent
- to invite you to participate in surveys, competitions and similar promotions
- to undertake credit checks of you (if necessary)
- to bill you and to collect money that you owe us, including authorising and processing credit card transactions
- to respond to communications from you, including a complaint
- to undertake administration of our Website
- to prevent and detect security threats, fraud or other malicious activity
- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorised by you or the Act.

We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Website, products, marketing and your experience. We may use and store this information in aggregated and anonymised form so that it is not associated with individual end users and does not include personal information.

We may on occasion also match or combine the personal information that you provide with information that we obtain from other sources or that is already in our records, whether collected online or offline or by predecessor or affiliated group companies, or business development partners, for the purposes described above.

5) Disclosing your personal information

We may disclose your personal information to:

- another company within our group
- agents, representatives, sponsors, societies and business partners and entities for which we are acting as an agent, licensee, joint venturer or publisher
- any business that supports our Services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the Website or other Services and products
- a credit reference agency for the purpose of credit checking you
- other third parties (for anonymised statistical information)
- a person who can require us to supply your personal information (e.g. a regulatory authority)
- any other person authorised by the Act or another law (e.g. a law enforcement agency)
- any other person authorised by you.

We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

A business that supports our Services and products may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand.

6) Cookies and similar tracking technologies

We may use cookies and similar tracking technologies (like web beacons and pixels) to access, collect and store your information. In general, cookies, web beacons and similar technologies do not contain personally identifiable information, but when you provide your personal information to us this information may be linked to the non-personally identifiable data stored in cookies sent to your browser from the Website.

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or Services of our Website.

7) Protecting your personal information

We have implemented appropriate technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals or other unauthorised third parties will not be able to defeat our security, and improperly collect, access, steal or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

8) Accessing and correcting your personal information

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information; (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If you want to exercise any of the above rights, email us at enquiries@dacreed.com. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

We may charge you our reasonable costs of complying with your request (e.g. providing to you copies of your personal information or correcting that information).

9) Internet use

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

If you follow a link on our Website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

10) How to contact us about this policy

If you have questions or comments about this policy, contact us at enquiries@dacreed.com.