

PRIVACY POLICY



1. WHO WE ARE

- 1.1 The website at www.savvynetwork.co.nz ("Our Website"), is a site operated by Savvy Network Limited ("We" or "Us" or "Our"). We are a limited liability company registered in New Zealand under company number 6040736. Information about what we do and the services we provide is available on the Website.

2. HOW THIS PRIVACY POLICY APPLIES

- 2.1 This Privacy Policy, together with our [General Terms and Conditions of Use](#) and any other documents that form part of our "Terms and Conditions" (as described in our General Terms and Conditions of Use) sets out the basis on which we hold, use and process any personal data we collect from you, or that you provide to us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our Website for using our mobile applications you are accepting and agreeing to the practices described in this Privacy Policy.
- 2.2 By using our Website or any services we provide, you agree to be bound by this Privacy Policy (as updated from time to time).
- 2.3 Please also note that the way in which your information is collected, stored, used and made available to other users of our services will depend on whether you create an account with us and become a registered user, and the type of services you use.

3. INFORMATION WE MAY COLLECT FROM YOU

- 3.1 We understand that you care about how any information about you is collected, used and shared and we appreciate your trust in us to do that carefully and sensibly. We are committed to protecting and respecting your privacy at all times. However please also be aware that it is important that we are able to get all of the information about you that we need, and that this information is accurate and up to date, otherwise we may not be able to provide our services to you effectively, or at all.
- 3.2 We may collect and process the following data about you:
 - (a) Information you give us. You may give us information about yourself by filling in forms on our Website or by corresponding with us by phone, mobile application, e-mail or otherwise. This includes information you provide when you register to use our Website and set up an account and/or create a profile, subscribe to any of our services, search for a service, place an order or enter into any financial transactions through our Website, participate in discussion boards or other social media functions on our Website, enter a competition, promotion or survey, and when you report a problem with our Website. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph, age, gender, and details about either your work history and contact details of your referees, or contact details for personnel at your company.
 - (b) Information we collect about you. With regard to each of your visits to our Website we may automatically collect the following information:
 - (i) Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

- (ii) Information about your visit and "tracking behaviour", including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time details); products you viewed or searched for; page response times, download errors, log files and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data and any other communications data, and any phone number used to call our customer service number.
 - (c) Information we receive from other sources. We may receive information about you from publicly and commercially available sources (as permitted by law), or if you use any of the other websites we operate or the other services we provide, and we may combine that information with other information we receive from or about you. We may also receive information about you from other registered users of our Website (who have set up an account and login with Us), and/or from any third-party social networking services when you choose to connect with those services. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, recruitment and HR advisers, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- 3.3 Please note that we are constantly innovating our business, our services and our Website, and so may in time collect different data from you, or collect it in different ways, and we will update this Privacy Policy as and when needed to reflect those changes.

4. COOKIES AND SIMILAR TECHNOLOGIES

- 4.1 Our Website uses cookies and similar technologies to assist us with providing you with an optimal experience and also to help improve and secure our Website (and your information). For detailed information on the cookies and similar technologies we use and the purposes for which we use them see our Cookie Policy at: [LINK].

5. WHAT WE USE YOUR INFORMATION FOR

- 5.1 We use information We hold about you in the following ways:
 - (a) Information you give to us. We will use this information:
 - (i) To process your applications and registrations and to set up and administer your account, to process any orders for services, to bill you or settle accounts with those who provide related services to us, and to carry out any necessary background checks or assessments and/or credit checking and scoring (unless we have agreed otherwise) and for contacting you generally in regards to your account and/or any services we provide;
 - (ii) To provide the services to you, and this may include providing any information about you to other users of our services, so that we can provide the services to you;
 - (iii) For any other necessary user related activities, including dealing with requests, enquiries or complaints and disputes or any insurance claims, and for any other necessary general administrative and business purposes;
 - (iv) To carry out our obligations or exercise our rights arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;

- (v) To provide you with information about other services we offer that are similar to those that you have already used, purchased or enquired about;
 - (vi) To provide you with, or allow selected third parties to provide you with, information about other goods or services we feel may be of interest to you. If you do not want us to use your data or contact you in this way, or to pass your details on to third parties for marketing purposes, please advise us at the time of registering with us (when will you be able to "opt-out") or subsequently by emailing us at info@savvynetwork.co.nz;
 - (vii) To notify you about changes to our services, this Privacy Policy, or the functions of our Website; and/or
 - (viii) To ensure that content from our Website is presented in the most useful and effective manner for you and for your computer, and that our services are, where possible, customised to your needs and developed, updated and improved as much as possible.
- (b) Information we collect about you. We will use this information:
- (i) to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - (ii) to carry out any activities connected with the running and administration of our business, such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or potential customer;
 - (iii) to improve our Website to ensure that our content is presented in the most useful and effective way for you and for your computer and that our services are updated and improved as much as possible;
 - (iv) to allow you to participate in interactive features of our service, when you choose to do so;
 - (v) as part of our efforts to keep our Website safe and secure;
 - (vi) to carry out market analysis and market our company and our services generally, measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - (vii) to make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.
- (c) Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes described above (depending on the types of information we receive).

6. DISCLOSURE OF YOUR INFORMATION

- 6.1 We may share your personal information with any member of our "group", which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act 1993.
- 6.2 We may share your information with selected third parties including:
- (a) Our credit card and debit card payment processing agents (our agent is currently EWAY, and you can review their Privacy Policy here at: <https://eway.io/nz/legal>. We know how important it is to protect the

security of your credit and debit card information. For that reason, we have contracted a leading payment services agent to store those details securely. When you provide us with your card details, and if you instruct us to save your card details for future transactions, we will only retain part of those card details, before sending them to our payment services agent using the Secure Sockets Layer (SSL) protocol, which encrypts the card details while they are transmitted. Our payment services agents will then securely store your card details in accordance with their own security protocols, and electronically confirm to us each time that you wish to make a transaction, if your existing card details held by them are still valid. Sharing your card details in this manner helps us ensure that your card details are securely stored at all times and that once transmitted to EWAY, we do not hold your card details;

- (b) Business partners, suppliers and sub-contractors who we engage to perform functions or services on our behalf. They will have access to your personal information, but only as necessary to perform their functions, and they may not use it for other purposes. They must also process the personal information in accordance with our Privacy Policy and as permitted by applicable data protection laws;
- (c) Carefully selected advertisers and advertising networks that require the data to select and serve relevant adverts to you and others, and those involved in the collection, aggregation, association, collation and analysis of data information the same or identical to yours, which may then be used by that party in relation to products and services that they supply. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (and you cannot be personally identified from this aggregated information). We may also use such aggregated information to help advertisers reach their target audience. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- (d) Analytics and search engine providers that assist us in the improvement and optimisation of our Website and our services; and
- (e) Credit reference agencies, for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

6.3 We may disclose your personal information to third parties:

- (a) In the event that we sell or buy any of our business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- (b) If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets (but will continue to be subject at all times to any pre-existing commitments to you regarding privacy).
- (c) If we are under a duty to disclose or share your personal data in order to meet any legal obligation, or in order to enforce or apply our Terms and Conditions [INSERT AS LINK TO GENERAL TERMS] or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

7. WHERE WE STORE YOUR PERSONAL DATA AND HOW WE PROTECT IT

- 7.1 The data that we collect from you may be transferred to, and stored at, a destination outside New Zealand. It may also be processed by staff operating outside New Zealand who work for us or for one of our suppliers. These staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- 7.2 All information you provide to us is encrypted using Secure Sockets Layer (SSL) software before being stored on our secure servers. Our servers may be located in New Zealand or elsewhere, and may be operated by us or our contractors but regardless will only be accessible by those authorized with special access rights to such systems, and under strict obligations requiring them to keep your information confidential.
- 7.3 Where we have given you (or where you have chosen) a password which enables you to access your account and certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 7.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; and so any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 7.5 We may retain information about you even after you close your account with us or have finished using any services, but we will take all reasonable steps to ensure that we retain such information only for so long as is necessary for the purpose for which it was collected, or as required under any contract or by applicable law.

8. YOUR RIGHTS

- 8.1 You can always choose not to provide us with any information, or to disable Cookies (as discussed in our [Cookies Policy](#), though this may affect your ability to access or use our Website or any particular features of it, and we may not be able to process transactions with you.
- 8.2 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by selecting that option when signing up with us or by contacting us at info@savvynetwork.co.nz
- 8.3 Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9. ACCESSING AND CORRECTING YOUR INFORMATION

- 9.1 The Privacy Act ("Act") gives you the right to access information held about you by us. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a reasonable fee as allowed under the Act to meet our costs in providing you with details of the information we hold about you. We will advise you of the applicable fee upon request and confirm whether you wish to proceed.
- 9.2 You may ask us to provide a copy of any Information (including personal information) we might hold about you and ask that we correct or delete any details that may no longer be correct. This can be done by contacting us at: info@savvynetwork.co.nz.

10. CHANGES TO OUR PRIVACY POLICY

- 10.1 Our Privacy Policy (and other Terms and Conditions) will change from time to time. Any changes we may make to our Privacy Policy in the future will be posted on our [legal documents page](#) and notifications of changes may also from time to time be emailed to you (unless you have instructed us not to contact you). You should check back frequently to see any updates or changes to our Privacy Policy as they will take effect from the date posted on our Site, and upon first using our Website or any services after that date, you will be confirming your agreement to those changes. We stand by our promises regarding your information however, and will not materially change our policies and practices to make them less protective of your information which we have already collected in the past, unless we get your permission to do so.
- 10.2 This Privacy Policy does not affect your rights under the Privacy Act 1993. This notice is provided for your information and is not intended to limit or exclude your rights under the Privacy Act 1993.

11. HOW WE RESPOND TO 'DO NOT TRACK' SIGNALS

- 11.1 As noted in our Cookies Policy, you can change settings on your device or browser to disable the use of Cookies and the other similar technologies we use.
- 11.2 If we receive a "Do not Track" Signal from you, we will cease to use all cookies other than "strictly necessary cookies" which apply to any features of our website or Services we offer. You will then be advised whether any feature of our website which you attempt to use or access will not correctly operate without additional tracking or cookies being enabled for any reason.

12. COLLECTION OF INFORMATION FROM CHILDREN

- 12.1 Our website, products and services are all directed to people who are at least 18 years old or older. If you are under 18 years of age, you may only use our Website with the involvement of a parent or guardian.

13. CONTACT

- 13.1 Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to us at: info@savvynetwork.co.nz