

## **PRIVACY POLICY**

### **INTRODUCTION**

Grounded Governance Limited (“we”) comply with the New Zealand Privacy Act 2020 when dealing with personal information. It applies to all personal information that we collect, process, or receive. This may be in person or via [www.grounded.kiwi](http://www.grounded.kiwi) (“Website”), email, social media, apps, over the phone, or through other channels.

Personal information is information about an identifiable individual (a natural person), and includes personal data, personally identifiable information and equivalent information under applicable privacy and data protection laws.

This policy does not limit or exclude any of your rights under the New Zealand Privacy Act 2020. For further information on the New Zealand Privacy Act 2020, see [www.privacy.org.nz](http://www.privacy.org.nz).

This policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. We are happy to provide any additional information or explanation needed. Any request for further information should be sent to [support@grounded.kiwi](mailto:support@grounded.kiwi).

### **CHANGES TO THIS POLICY**

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

This policy was last updated on 11.8.2021.

### **WHEN DOES THIS PRIVACY POLICY APPLY?**

This privacy policy applies to personal information we collect from visitors to our Website, our customers and other persons with whom we deal directly.

### **WHAT PERSONAL INFORMATION DO WE COLLECT?**

We will collect your personal information where you choose to provide it. The type of personal information we collect depends on the nature of our relationship with you.

- When you visit our Website, we do not collect any personal information about you, except through the use of cookies. When you access and use our Website or related services we may automatically collect information about your device and usage of our Website, products and services, including your IP address, operating system, browser type, time spent on certain pages of the website, pages visited, links clicked and language preferences.

Some of this data is collected through third party tools and/or the use of cookies, web beacons and similar storage technologies. Please refer to our Cookie Policy below for further information, including information on how you can disable these technologies.

- When you contact us, we may collect your name, email address, phone number and any other information you choose to provide to us.

- When you sign up to our newsletter and other electronic alerts, we may collect your name, email address, phone number, user preferences and any other information you provide to us. You can unsubscribe from them at any time.

- When you respond to our feedback surveys, we may collect your name, email address, date of birth, demographic information and any other information you choose to include.

- When you purchase services from us, we may collect your name, date of birth, email address, phone number, credit card information, and any other information you submit to us for billing and order fulfilment purposes.

Where you provide us with personal information, you agree to allow our use of this information as detailed in this Privacy Policy. We try to only collect the personal information necessary to fulfil your request.

Some of the personal information that we collect directly from you may be mandatory and some may be optional. If you require further information about the consequences of not providing us with any information, please contact us at [support@grounded.kiwi](mailto:support@grounded.kiwi).

We deliver some email updates via independent mail management company services. It will provide analytics to us on how people interact with our newsletters (e.g., how many subscribers have opened emails or clicked on links). This means that the service will be able to see your name, email address and details about which links in our newsletters you have clicked on. We only use this information to assess newsletter effectiveness.

## **HOW WE USE YOUR PERSONAL INFORMATION**

We may use your personal information to:

- verify your identity
- provide our Website, products and services to you
- provide you with documentation
- market our products and services to you, including contacting you electronically
- improve our Website, products and services
- publish things on our Website (e.g. comments on pages)
- run promotions (e.g. referral and loyalty programmes, surveys and contests)
- bill you and collect money that you owe us, including authorising and processing credit card transactions

- respond to communications from you, including enquiries and complaints
- conduct research and statistical analysis
- tailor content or advertisements on our Website
- protect and/or enforce our legal rights and interests, including defending any claim
- respond to lawful requests by public authorities, including to comply with law enforcement requirements, or
- for any other purpose authorised by you or applicable law.

We may transfer your information in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition.

## **DISCLOSING YOUR PERSONAL INFORMATION**

We may disclose your personal information to:

- any business that supports (or delivers services you have requested in connection with) our website, products and services, including any person that hosts or maintains any underlying IT system or data centre that we use to provide our Website, products or services or that we use to process payments
- third parties (for anonymised statistical information)
- professional advisers e.g. accountants, lawyers or auditors
- a person who can require us to supply your personal information (e.g. a law enforcement agency or regulatory authority)
- any other person with your consent
- any other company in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition
- any other person authorised by applicable law.

Also, we may share information about your use of our Website with our trusted advertising and analytics partners through the use of cookies, web beacons, and similar storage technologies. Please refer to our Cookie Policy below for further information.

## **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

A business that supports our Website, products and services or delivers services that we sell as agent may be located outside of New Zealand (the country where we are incorporated) and also outside of the country where you are located. This means that the personal information we collect may be transferred to, and stored in, a country outside of

New Zealand and the country where you are located. Therefore we cannot guarantee that the same standards apply in that country as apply in New Zealand. By proceeding to give us your personal information, you acknowledge and consent to this arrangement.

For further information, please contact us at [support@grounded.kiwi](mailto:support@grounded.kiwi).

The personal information we collect is mostly processed in New Zealand. New Zealand is recognised by the European Commission as a country that has an adequate level of data protection and we may rely on this recognition in transferring personal information within New Zealand.

## **PROTECTING YOUR PERSONAL INFORMATION**

As required by applicable law, we will take steps to keep your personal information safe from loss, unauthorised activity, or other misuse. You play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used in relation to our products and services. You should not disclose any such password to third parties. Please notify us immediately if there is any unauthorised use of your account or any other breach of security.

## **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

Subject to certain grounds for refusal under applicable law, you have the right to access your 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.

Where you request a correction, if we think the correction is reasonable and we are reasonably able to change your personal information, we will make the correction. In all other cases, we will take reasonable steps to make a note of the personal information that was the subject of your correction request.

If you want to exercise either of the above rights, email us at [support@grounded.kiwi](mailto:support@grounded.kiwi).

Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information to be corrected and the correction that you are requesting).

Subject to applicable law, we may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

## **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 website, the owner of that website will have its own privacy policy relating to your personal information. We suggest you review that website's privacy policy before you provide personal information to that owner or website.

#### **DATA RETENTION POLICY**

The personal information that we collect and use is not intended to be kept longer than necessary for the purposes for which it is collected.

#### **CONTACTING US**

If you have any question about this Privacy Policy, or our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us at [support@grounded.kiwi](mailto:support@grounded.kiwi).

The name and contact details of our Data Protection Officer are:

Marcella Collins      [support@grounded.kiwi](mailto:support@grounded.kiwi)