

## SimSage Limited Privacy Policy

This Privacy Policy was updated on 2 December 2020

Protecting your personal information is important to SimSage. So is following New Zealand's privacy laws. This Privacy Policy tells you how we will protect your privacy and collect and use your personal information (any reference to "we", "us" or "our" is to SimSage Limited)

**"Personal Information"** means any information that can directly or indirectly identify you or another person.

This Privacy Policy applies to anyone in New Zealand who uses our website <https://simsage.nz/> (**Website**), buys or uses our services (**Services**) or otherwise interacts with us. By using our Website, buying or using our Services and interacting with us, you agree to the terms of this Privacy Policy.

If you have any questions, you can contact our Privacy Officer at [sean@simsage.nz](mailto:sean@simsage.nz).

### YOUR RIGHTS

We'll only use your Personal Information for the reasons that we collected it, and in accordance with this Privacy Policy. If we don't need your Personal Information anymore for those reasons, then we'll stop using it.

If you don't agree with our Privacy Policy or don't want us to collect your Personal Information, then you shouldn't use our Website, Services or interact with us. If you change your mind and don't agree with our Privacy Policy anymore, then you should stop using our Website, Services or interacting with us.

SimSage may still need to keep your Personal Information so long as it is required for the purpose for which the Personal Information was collected or as required by law.

### PERSONAL INFORMATION WE COLLECT ABOUT YOU

We collect your Personal Information in the course of providing our Services to you or through your use of our Website.

Depending on your use of our Services or Website, you might give us Personal Information such as:

- Your name and contact details.
- Your username, role, authentication and security credential information.
- Your service and product preferences.
- Your account and payment history with us.
- Information about your use of our Services.
- Information about the webpages you visit on our Website.
- Information you provide to us when responding to our customer surveys.
- Any other information you give us.

Please don't give us Personal Information about someone else unless you have their express permission to do so and you direct them to this Privacy Policy. It is best that any Personal Information about another person is directly provided to us by the person concerned.

### HOW WE COLLECT YOUR INFORMATION

There are 4 main ways that SimSage uses to collect your Personal Information:

- **From you directly:** Personal Information you provide to us directly.
- **From you indirectly:** Personal Information we collect from you when you visit or use our Website, use our Services or interact with us.
- **From third parties:** Personal Information collected and disclosed to us by our contractors, agents and service providers, commercial partners whom we engage to perform services on our behalf, our affiliates and other third parties necessary for the provision of our Services.
- **From publicly available sources:** From places where the information is publicly available.

### HOW WE USE AND SHARE YOUR INFORMATION

SimSage will only collect, use and disclose your Personal information for purposes in connection with the operation of our Website, and to operate, provide and improve our Services, including the following:

- **Providing Services to you:** To provide and deliver our Website and Services to you, and process transactions related to our Services.
- **Administering your account:** To verify your identify when you login into your SimSage account, to record and administer your activities and transaction history and to generally administer your account.
- **Improve our Services and Website:** To measure and analyse the performance of our Website and Services; fix errors and provide support for, improve and develop our Website and Services.
- **Personalise your user-experience:** To personalise your user-experience when using our Website and Services.
- **Communicate with you:** To communicate with you about our Website, Services, your SimSage account and any queries you may have from time to time about our Services, including recommending Service offerings that might be of interest to you.
- **Record keeping purposes:** For our internal record keeping purposes, including for the maintenance of our data security.
- **Fraud and data breach prevention:** To prevent and detect fraud, abuse and data security breach.
- **Business sale:** To facilitate the sale or other disposition of our business or assets.
- **Legal compliance:** To comply with our legal obligations.
- **Other purposes:** For any other purposes that you authorise.

(together, the **Purpose**)

We may disclose your Personal Information to the following third parties but only in connection with the Purpose:

- SimSage’s service providers, suppliers, employees, contractors, agents and professional advisors.
- SimSage’s affiliates and strategic and business partners.
- Any other third party that you authorise.

#### **HOW WE SAFEGUARD YOUR PERSONAL INFORMATION OUTSIDE NEW ZEALAND**

From time to time, we may disclose, and you authorise us to disclose, your Personal Information to an overseas service provider for the above purposes. We make sure that the overseas service provider is:

- a participant in a prescribed binding scheme for international disclosures of personal information; and/or
- is located in a country that provides comparable safeguards to New Zealand’s privacy laws, approved by the Privacy Commissioner.

If not, then we will take reasonable steps to ensure that the overseas service provider is required to protect your Personal Information in a way that, overall, provides comparable safeguards to those required under New Zealand’s privacy laws.

Examples of these steps include a written agreement between us and the overseas service provider or making reasonable enquiries regarding data protection standards of the country in which the overseas service provider is located.

#### **AGGREGATE INFORMATION**

From time to time, SimSage may aggregate information for analysis and statistical purposes relating to the provision, operation and improvement of our Website and Services. This may involve “de-identifying” or anonymising your Personal Information. Aggregate information may be shared with third parties and used in connection with the Purpose. Once we de-identify or anonymise your Personal Information, the information can no longer be linked to you and will no longer be your Personal Information.

#### **COOKIES**

Cookies are small text files placed on your computer, mobile phone, tablet, or other electronic device to store data that can be recalled by a web server in the domain that placed the cookie. This data often consists of a string of numbers and letters that uniquely identifies your device, but it can contain other information as well. Some cookies are placed by third parties acting on our behalf. We may use cookies and similar technologies to store and honour your preferences and settings, enable you to sign-in, provide interest-based advertising, analyse how our Service perform, and fulfil other business functions or operations set out in this Privacy Policy.

To enable some of the features and functionality on our Website, you may need to permit us to place cookies on your device. You can remove or block cookies by using the settings in your browser, but it may affect your ability to use our Website.

## **E-COMMUNICATIONS**

You consent to receiving information from us about our Services, promotions and competitions via email, text message and social media. If you want us to stop sending you electronic communications, then you can simply unsubscribe at any time by following the instructions included in the electronic communication.

## **HOW WE PROTECT YOUR PERSONAL INFORMATION**

We have reasonable protections in place against unauthorised access, use, modification, disclosure and loss of your Personal Information. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our sites; any transmission is at your own risk.

## **REQUEST ACCESS OR CORRECTION TO YOUR PERSONAL INFORMATION**

You're allowed to see what Personal Information we have about you, and you can ask us to correct it if you think it's wrong. If there is a legal reason why we can't let you see it, or if we don't agree with your correction, then we'll tell you.

## **PRIVACY COMPLAINTS**

If you think that we haven't properly protected your privacy, you can tell our Privacy Officer here [sean@simsage.nz](mailto:sean@simsage.nz), or complain to the New Zealand Privacy Commissioner.

## **PRIVACY POLICY CHANGES**

We may from time to time change our Privacy Policy. These changes may reflect, among other things, changes in laws, our data collection practices, and/or changes to our business, Services. We will post any updated policies on our Website. The updated Privacy Policy will take effect 14 days after the date it is posted.

If you continue to use our Services or continue to visit our Website or interact with us after the updated Privacy Policy comes into effect, then this will indicate that you have agreed to our changes.

We encourage you to review our Privacy Policy periodically for any changes.