

# SwipedOn Privacy policy

## INTRODUCTION

Swiped On Limited NZ Company No. 655878 (**we, us, our, SwipedOn**) complies with the Privacy Act 1993 (New Zealand) (the **Act**) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

This policy sets out how we will collect, use, disclose and protect your personal information. This policy forms part of our Terms of Use.

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](http://www.privacy.org.nz).

## SCOPE OF INFORMATION

We collect and hold two categories of personal information in connection with our products and services

- ▲ **Customer Information** is personal information about a customer or potential customer that a customer or potential customer provides to us, or authorises us to collect:
  - in connection with the creation or administration of a customer account
  - through any registration or subscription process relating to our services and products, or through any registration or subscription to receive information about our services and products
  - through any direct contact with us (e.g. telephone call or email)
  - when a customer buys or uses our services and products.

Customer Information includes names, usernames, phone numbers, email addresses and billing information associated with a customer account or any registration or subscription.

- ▲ **User Data** is:
  - personal information that a customer or any end user of our product or service transfers to us for processing or storage using our service
  - any results that a customer or any end user of the service derives from that information through their use of the service.

We will not disclose, move, access or use User Data except as provided in our terms of service at *[insert link]* or in any other agreement with the applicable customer, and we require our customers to comply with applicable privacy laws.

**The remainder of this privacy policy sets out how we will collect, use, disclose and protect Customer Information and does not apply to User Data.**

## **CHANGES TO THIS POLICY**

We may change this policy by uploading a revised policy onto our website ([www.swipedon.com](http://www.swipedon.com)) (the **website**). The change will apply from the date that we upload the revised policy.

## **WHO DO WE COLLECT YOUR PERSONAL INFORMATION FROM**

We collect personal information about you from:

- ▲ you, when you provide that personal information to us, including via the website and any related service including the SwipedOn App, 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
- ▲ third parties where you have authorised this or the information is publicly available.

If possible, we will collect personal information from you directly.

Some provision of personal information is optional. However, if you do not provide us with certain types of personal information, you may be unable to enjoy the full functionality of products and services.

We may also conduct user surveys to collect information about your preferences. These surveys are optional and if you choose to respond, your responses will be kept anonymous. Similarly, we may offer contests to qualifying users in which we ask for contact and demographic information such as name, email address and mailing address. None of this information is shared with third parties, except in summary form, if at all. Information we gather through a contest may also be disclosed to third parties as necessary for prize fulfilment and other aspects of any contest or similar offering.

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

We will use your personal information:

- ▲ to verify your identity
- ▲ to provide services and products to you
- ▲ to market our services and products to you, 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 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 conduct research and statistical analysis (on an anonymised basis)
- ▲ 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 will not assign any unique identifiers to an individual unless the assignment of that identifier is necessary to enable SwipedOn to provide the Services. Pursuant to Information Privacy Principle 12 of the Act, if Swiped On assigns unique identifiers, SwipedOn will take all reasonable steps to ensure that such unique identifiers are assigned only to individuals whose identity is clearly established.

## **DISCLOSING YOUR PERSONAL INFORMATION**

We may disclose your personal information to:

- ▲ any other company within our group for the purposes described in this policy
- ▲ 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.

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.

## **PROTECTING YOUR PERSONAL INFORMATION**

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

## **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.

If you want to exercise either of the above rights, email us at [hello@swipedon.com](mailto:hello@swipedon.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 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 or in the SwipedOn App 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.

We use cookies (an alphanumeric identifier that we transfer to your computer's or device's hard drive so that we can recognise your browser) to enable users to specify unique preferences and monitor your use of the website. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of the website. Please refer to our [Cookie Policy](#) for further information.

# SwipedOn Cookie policy

This Cookie Policy forms part of our Terms of Use, including our privacy policy. Your continued use of the website will signify your acceptance of this Policy. We may modify this Policy without notifying you, so we encourage you to check this Policy from time to time.

By using the website, you are agreeing that we can use the cookies described in this Cookie Policy. You can stop cookies by changing the settings on your browser.

## What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your browsing device, e.g. a computer or smartphone, when you visit a website. Cookies can be recognised by the website that downloaded them, or other websites that use the same cookies. This helps websites know if the browsing device has visited them before.

Cookies do lots of functions, like helping us understand how the website is being used, letting users navigate between pages effectively, remembering your preferences, and generally improving your browsing experience. Cookies can also help ensure marketing you see online is more relevant to you and your interests.

## What types of cookies does SwipedOn use?

The types of cookies used by most websites can generally be put into five categories: Strictly Necessary, Performance, Functionality, Tailored Content and Targeting.

### Strictly Necessary Cookies

These cookies are essential for the full functionality of the website. They enable you to navigate around the website and use its features, such as accessing secure areas. Without these cookies, you may not be able to access all the functions of the website.

### Performance Cookies

These cookies collect information about how you use the website, e.g. which pages are the most visited and if you receive any error messages from any pages. These cookies do not gather information that identifies you. All information these cookies collect is anonymous and only used to improve how the website works.

## **Functionality Cookies**

These cookies allow the website to remember the choices you make, e.g. your user name, language or your region. These cookies can also be used to remember the changes you made to text size, font, and other parts of pages that you can customise. They may also be used to provide Services you have requested, e.g. watching a video or commenting on a post. The information these cookies collect may be anonymous and they cannot track your browsing activity on other websites.

## **Tailored Content Cookies**

These cookies help the website provide enhance features and display content in a way that is relevant to you. They help determinate what information is shown on the website based on how you have used the website previously. These cookies also track your browsing activity on other websites.

## **Targeting Cookies**

These cookies are used to delivery advertisements that are more relevant to you and your interests. They are also used to limit the number of times you seen an advertisement as well as help measure the effectiveness of the advertising campaign. They remember that you have visited a website and this information may be shared with other organisations such as advertisers. This means that after you have been to the website, you may see some advertisement about our services elsewhere on the Internet.

## **How long will cookies stay on my browsing device?**

The length of time a cookie will stay on your browsing device depends on whether it is a persistent or session cookie. Session cookies will only stay on your browsing device until you stop browsing. Persistent cookies will stay on your browsing device until they expire or are deleted.

## **First and third party cookies**

First party cookies are cookies that belong to SwipedOn, while third party cookies are cookies that another party places on your browsing device through our website.

## **How to control and delete cookies through your browser**

The browser you are using to view the website can enable, disable or delete cookies. To do this, please follow the instructions provided for your browser.

Please note that if you set your browser to disable cookies, you may not be able to access certain parts of the website or Services. Other parts of the website may also not work properly. You can find out more information about how to change your browser cookie settings at [www.allaboutcookies.org](http://www.allaboutcookies.org).

Please note that we use Google Analytics, which may use Google's own cookies. Information about Google's cookies is available from: <https://www.google.com.au/policies/technologies/types/>. Google's applicable privacy policy for Google Analytics cookies is available at: <https://www.google.com/policies/privacy/partners/>.

## **Third party websites cookies**

Other websites may use different cookies from those SwipedOn uses. You acknowledge and agree that SwipedOn is not responsible for any third party websites or applications and you access third party websites and applications at your own risk. Please understand other websites and applications are independent from SwipedOn so you must inform yourself of their separate cookie policies.