

# Smetric Insights Privacy Policy

## INTRODUCTION

Smetric Insights Limited, (**we, us, our**) complies with the Privacy Act 1993 (NZ) (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 does not limit or exclude any of your rights under the Act. If you want further information on the Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

## APPLICATION OF THIS POLICY

By accessing or using our website or services, you consent to the collection, use, disclosure, storage and processing of your personal information in accordance with this policy and the Act. If you do not agree to this policy, you must not use our website or services.

## 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.

**This policy was last updated on 1 June 2018.**

## SCOPE OF THIS POLICY

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 subscription-based service (**Service**) transfers to us for processing or storage using the 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 below, in our SaaS Agreement or in any other agreement with the applicable customer, and we require our customers to comply with applicable privacy laws.

This policy does not limit or exclude any of your rights under applicable privacy law.

## **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 our website, the Service 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
- ▲ third parties where you have authorised this or the information is publicly available.

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

You are under no obligation to provide any such information. However, if you choose to withhold requested information, we may not be able to provide you with certain services or functionality.

You can stop the collection of your personal information by cancelling your account, or by ceasing to use our products and services.

## **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 our website and the services and products that we provide to you and our other customers, including by analysing how you interact with the website and our services and products
- ▲ 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, including benchmarking with industry information if you opt-in for benchmarking in relation to anonymised User Data.
- ▲ 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 remove any personally identifying information before aggregating data and/or providing anonymised benchmarking business information to you and to other customers.

You can unsubscribe from any marketing communications from us by following the instructions on any communications sent to you. You can also exercise this right at any time by contacting us using the details at the end of this privacy policy.

## **DISCLOSING YOUR PERSONAL INFORMATION**

We may disclose your personal information to:

- ▲ another company within our group
- ▲ 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.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information we hold. However, we will not be held responsible for any unauthorised access to your personal information.

You can 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. 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 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 [support@smetric.co.nz](mailto:support@smetric.co.nz). 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 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 hard drive so that we can recognise your browser) to 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 our website or the Service.

We use Google Analytics. For more information on how Google collects, uses, discloses and protects data when you use our Website please see 'How Google uses data when you use our partners' sites or apps' at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners)

## **CONTACT US**

If you have any questions about this privacy policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us here [support@smetric.co.nz](mailto:support@smetric.co.nz).