

COUCHDROP PRIVACY POLICY

INTRODUCTION

Couchdrop Limited (**we, us, our**) complies with the New Zealand Privacy Act 2020 (the **Act**) when dealing with Personal Information. **Personal Information** is information about an identifiable individual, living person, and includes personal data, personally identifiable information and equivalent information. This Couchdrop Privacy Policy is referred to as the **Policy** in this document.

Any word or phrase that is used in this Policy and defined in the Terms of Use has the meaning given in those Terms of Use.

This Policy sets out how we will collect, use, disclose and protect your Personal Information when you interact with us, the Website or the Service.

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.

You must not provide us, or use the Website or the Service to process, any Personal Information that is regulated by:

- the Payment Card Industry Data Security Standard;
- HIPAA unless and until you have entered into a separate business associate agreement with us;
- CCPA unless and until you have entered into a separate CCPA data processing agreement with us; and/or
- EU/UK Data Protection Laws unless and until you have entered into a separate EU/UK Data Protection Laws data processing agreement with us.

Where you have agreed a separate agreement, the additional terms set out in that agreement will apply to the processing of Personal Information under HIPAA, CCPA, or EU/UK Data Protection Laws (as the case may be).

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 12/April 2022.

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 the 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, including using the Website and Service

- from third parties where you have consented to (or authorised) this
- from information that is publicly available.

If possible, we will collect Personal Information from you directly.

WHAT PERSONAL INFORMATION DO WE COLLECT

We the types of Personal Information we collect may include:

- names
- addresses
- contact details
- identification details
- other Personal Information that you have consented to being processed through the Website and Service.

HOW WE USE YOUR PERSONAL INFORMATION

We will use your Personal Information:

- to verify your identity
- to provide the Service to you or to provide the Service to a third party (where that third party holds your Personal Information)
- to market the Service to you, including contacting you electronically (e.g. by text or email for this purpose)
- to improve the Service 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 protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose advised to you before or at the time of collecting the Personal Information
- for any other purpose authorised by you or the Act.

DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your Personal Information to:

- another company within our group
- any business that supports our Service, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the Website or the Service. A list of the persons (as updated from time to time by us) is included on the [Website](#). A business that supports our Service may be located outside New Zealand. This may mean your Personal Information is held and processed outside New Zealand
- a credit reference agency for the purpose of credit checking you
- 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 consented to (or authorised by) you.

In addition, you agree that:

- we may transfer your Personal Information to third parties in connection with a disposal of assets, restructuring, merger, or sale; and
- that third party is permitted to use, disclose and process your Personal Information in the same way as us.

PROTECTING YOUR PERSONAL INFORMATION

We will take reasonable steps to keep your Personal Information safe from loss, unauthorised activity, or other misuse. The security standards with which we comply are listed on the [Website](#).

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 security@couchdrop.io. 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.

COOKIES

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 and Service; and
- enable you to maintain your session using the Service.

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 and Service.

CONTACTING US

If you have any questions about this Policy, our privacy practices, or if you would like to request access to, or correction of, your Personal Information, you can contact us at security@couchdrop.io.

Versions

Amendments and changes to this document will be noted below

| Version Number | Date | Notes |
|--------------------|----------------------|------------------------|
| <i>Version 1.1</i> | <i>12 April 2022</i> | <i>Initial version</i> |