## **Our Privacy Commitment**

Divers Group Limited ("**Divers**") and its related companies and affiliates ("**we**", "**us**", "**our**") is committed to respecting your privacy.

We will always collect, store, use and disclose your Personal Information in accordance with the Privacy Act 1993.

However, we have also put in place the following Privacy Policy to protect your Personal Information when you submit, or we collect, that information – including via our "**Online Services**", such as:

- our website ("Website");
- mobile operating applications including applications for smart phone, tablet and other handheld devices ("Apps");
- social media pages, including Facebook, Twitter, YouTube and Instagram, LinkedIn;
- email communications and subscription services; and
- Wi-Fi services, including communication via wireless networks,

to enable us to provide ICT equipment refresh, deployment, relocation, disposal, storage, delivery, asset management, forensic and related services to you ("**Services**").

By providing us with Personal Information, you consent to the collection, storage, use and disclosure of Personal Information in accordance with this Privacy Policy.

In this policy, "**Personal Information**" means information about an identifiable individual. By way of example, this type of information includes your name and contact details.

#### **Changes to this Privacy Policy**

We may modify, amend, change or replace any of the terms, conditions or provisions of this Privacy Policy from time to time, and will notify you of any changes by posting an updated version on our website. It is your responsibility to check this Privacy Policy periodically for changes.

Your continued use of our Services following notification of any changes to this Privacy Policy constitutes acceptance of those changes. If you do not agree with any aspect of the updated Privacy Policy, you must immediately cease all use of our Services.

## 1 WHAT INFORMATION DO WE COLLECT?

You may give us information about yourself, such as your name, address, email address, passwords, and telephone number, when, for example, you contact us via our Online Services.

We also receive information about other people from you. Please refer to the section "FORENSIC SERVICES" for further information on how we handle this information.

# 2 WHAT INFORMATION DO WE COLLECT VIA OUR ONLINE SERVICES?

#### (a) <u>Other Information collected about you</u>

When you visit our Website or other Online Services, we may collect more information, such as the address of your Internet service provider, the name of the web page directing you, and your clicks and activity on our site.

Clickstream data and other related information about visits to our Apps and related Online Services may be collected. In addition to this, usage and performance data through our Apps using various platform specific tracking technologies available to the Apps may be collected.

# (b) <u>Other Information collected from third parties</u>

Information may be collected about you from third parties (including our third-party affiliates or partner companies and from marketing or advertising companies) who may provide us with such information as part of their relationship with us. We may combine this information with other information that we hold.

Third party service providers may be allowed to use technologies including mobile monitoring and tracking technologies in relation to our Online Services. These third-party service providers may collect information sent by your browser or mobile device.

Additional information may be collected about you when you use our Online Services.

## (c) <u>Cookies and other monitoring devices</u>

We may collect aggregated information by using cookies. Cookies are unique identification numbers like tags that are placed on the browser of internet users. The cookies do not in themselves identify users personally, but may link back to a database record about them. We may use cookies to track any aspect of our Website or other Online Services.

We may use services such as Google Analytics, which will issue cookies from their own servers and which will be able to track website visitors throughout relevant websites. We do not control how those cookies are issued, or the data that they store.

We may use "*web beacons*" (electronic images also known as pixel tags or clear gifs) to recognise a cookie on your computer when you view or act upon a web page, an advertisement that we have placed on a third party web page, or an email or other electronic communication that we have sent.

We may also use Local Shared Objects, sometimes referred to as "*Flash*" cookies. Use of Local Shared Objects can help deter, detect and prevent fraud and can support our Online Services.

# 3 HOW IS YOUR PERSONAL INFORMATION USED?

We may (and may authorise third parties to) use your Personal Information to provide you with our Services and to help us develop, improve, manage, administer and facilitate our Services (including to provide the Online Services), to help us develop our Services to be more available and user friendly to our customers, for safety and security issues, for our own internal purposes (such as risk management, staff training and billing), to conduct market research, for any purpose permitted by law, and for any other use associated with such purposes or which you may authorise.

In addition, we may use your Personal Information to promote and market our products and services. However, we will not do this by email or text (except as part of an email which facilitates, completes or confirms a transaction with you) unless we have your express or deemed consent to do so. These emails and texts will always include an "*unsubscribe*" facility (see section 6 for more information on email and text communication).

# 4 IN WHAT CIRCUMSTANCES MIGHT WE DISCLOSE YOUR PERSONAL INFORMATION?

We do not sell, trade or rent your Personal Information to others.

However, we may use other companies and individuals to perform services on our behalf, such as delivering packages, sending mail and emails and processing payments. They will have access to your Personal Information needed to perform these services, but we will not authorise them to use your information for other purposes.

In addition, we may provide statistics about our customers, sales, traffic patterns and related site functions to reputable third parties.

We will not otherwise disclose your Personal Information unless we believe on reasonable grounds that you have provided your authorisation. However, you should be aware that we may be required to disclose your Personal Information without your consent in order to comply with any court orders, subpoenas or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your Personal Information.

# 5 STORAGE AND SECURITY

We are committed to protecting the security of your Personal Information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure.

We use industry standard (or better) administrative, physical and technical protections to safeguard the security, privacy, confidentiality and integrity of your Personal Information.

Except to the extent we agree in writing, we accept no responsibility for any loss, misuse, unauthorised access or disclosure, alteration or destruction of Personal Information you submit to us.

We also store the information about other people we receive from you. Please refer to the section "FORENSIC SERVICES" for further information on how we store and secure this information.

# 6 LINKS TO OTHER WEBSITES

Our Online Services may contain links to other websites that are not under our control. These websites may use cookies. It is the responsibility of those third parties to collect appropriate consents from you in order to permit their own cookies (to the extent this is required by law) and to inform you about the cookies they use. You should check the Privacy Policy on all third party websites to ensure you are comfortable with third party cookies.

We have no responsibility for linked websites, and provide them solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or warranties about their accuracy, content or thoroughness. Your disclosure of Personal Information to third party websites is at your own risk.

# 7 EMAIL AND TEXT COMMUNICATIONS

We are committed to full compliance with the Unsolicited Electronic Messages Act 2007.

By subscribing to emails and/or text communications, or otherwise providing your email address and/or mobile number, you consent to receiving emails and/or texts (as the case may be) which promote and market our products and services from time to time.

You can unsubscribe from our email communications and/or text communications at any time by clicking the "*Unsubscribe*" link in any promotional or marketing email or replying to a text received or by emailing <u>enquiries@divers.co.nz</u>

Once you have unsubscribed from the email or text communications, you will be removed from the corresponding marketing list as soon as is reasonably practicable.

# 8 HOW YOU CAN REQUEST ACCESS OR CORRECT YOUR PERSONAL INFORMATION

You may request access to the information we hold about you, or request that we update or correct any Personal Information we hold about you, by setting out your request in writing and sending it to us at <u>enquiries@divers.co.nz</u>

We will review your request as soon as reasonably practicable. If we are unable to give you access to the information you have requested, we will give you reasons for this decision when we respond to your request.

We will only keep your Personal Information for as long as we require it for the purpose for which it was required. However, we may also be required to keep some of your Personal Information for specified periods of time under certain laws.

# 9 FORENSIC SERVICES

## (a) Information we receive

You may provide us with personal information about other people when using certain Services.

Where you have provided us with such information, you confirm that you are authorized by the relevant individuals to disclose their personal information to us.

# (b) <u>Security and Storage of information on your devices</u>

We will only wipe or delete information from your devices if you instruct us in writing to do so.

We will also only wipe or delete information from your devices using whichever of our destruction methods you have requested in writing.

In the absence of your instructions to delete such information, we will only retain personal information for so long as we have a lawful basis to do so. All personal information will be wiped before any device being marketed or disposed.

# Feedback / Queries

If you have any questions regarding our Privacy Policy, please call us on (09) 255 0196 or email us at <a href="mailto:enquiries@divers.co.nz">enquiries@divers.co.nz</a>