## **PRIVACY POLICY**

We are committed to protecting your privacy online. This policy (together with our <u>Terms</u> <u>of Use</u>) sets out the basis on which any personal data we collect from you, or that you provide us with will be processed by us when you use the Swapology website (**Swapology.co.nz**). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Swapology.co.nz is operated by Swapology Ltd. and is also referred to as "we" and "us".

## Information we May Collect from You

We may collect and process the following data about you:

- Account information: The information (including your first name, surname, postcode and email address) that you provide by setting up an account through Swapology.co.nz, in registering for our newsletter, in entering into any transaction through Swapology.co.nz or otherwise by contacting us.
- **Site Activity:** we will automatically collect the following information about your use of Swapology.co.nz:
  - technical information, including: the IP address used to connect your computer to the internet; browser type and version; and time zone setting;
  - information, including the full URL; clickstream to, through and from Swapology.co.nz and Listings that you viewed.
- **Communications:** When you sign up for an account, you are opting in to receive certain legal and administrative emails from us, which are necessary for the provision of Swapology.co.nz to you. You may also choose to sign up to receive certain marketing or additional emails. You can manage your preferences in terms of receipt of these communications through your account settings. You cannot, however, opt out of receiving certain legal or administrative notices from us. If you enter one of our competitions we will keep a copy of the data you submit to us.
- Information provided to us from other sources: we may receive information about you from third parties in the course of making available Swapology.co.nz to you, including organisers of events that are listed on Swapology.co.nz; business partners; sub-contractors; and payment providers.

#### We use information held about you in the following ways

#### Information you give to us

We use this information:

- to make Swapology.co.nz available to you;
- provide you with information about activities that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- administer your account with us;

- provide information to Suppliers with whom you book activities through Swapology.co.nz in order to facilitate such bookings;
- disclose to lawful authorities when required to do so by law;
- notify you about changes to Swapology.co.nz; and
- ensure that Swapology.co.nz is presented in the most effective manner for you.

## Information that we collect about you

We use this information to:

- identify you as a user of Swapology.co.nz;
- administer Swapology.co.nz;
- ensure that Swapology.co.nz is presented in the most effective manner for you;
- measure and understand the effectiveness of certain features of Swapology.co.nz; and
- provide location-based services to you if you access our website via a mobile browser and you allow the transmission of your location data when prompted by your browser.

# Information we receive from other sources

We will combine this information with information you give to us and information that we collect about you. we will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## Cookies

We may collect information about your computer or mobile device, including where available your IP address, operating system and browser type, for system administration, and to report aggregate information to our business users. This is statistical data about the browsing actions and patterns of our users. we may obtain information about your usage of Swapology.co.nz by using a cookie file which is stored on the hard drive of your computer or the internal memory of your mobile device. Cookies contain information that is transferred to your computer's hard drive or your mobile device's internal memory. Cookies help us to: improve Swapology.co.nz; deliver a better and more personalised service both through Swapology.co.nz and through third party websites and applications.

They enable us to:

- support our analytics, to estimate our audience size and usage patterns;
- prevent fraud, and your data from unauthorized parties, and comply with legal requirements. For example, we use cookies to determine if you are logged in;
- store information about your preferences, and so allow us to customise Swapology.co.nz according to your individual interests;
- manage notifications and some of the content you see, so that you don't keep seeing the same notifications over and over again;
- deliver advertising to you that is more suited to your interests, both through Swapology.co.nz and through third party websites and applications (including Facebook and Instagram);



- speed up your searches; and
- recognise you when you return to the website.

You may refuse to accept cookies by activating the setting on your browser or your mobile device which allows you to refuse the setting of cookies. If you select this setting you may be unable to access certain parts of Swapology.co.nz. Unless you have adjusted your browser or mobile device setting so that it will refuse cookies, our system will issue cookies when you log on to Swapology.co.nz.

# Third party providers - Analytics

- we may use third party vendors to assist us to analyse how our website is used. These third parties have access to your personal information only to enable them to perform these tasks on our behalf and they may not disclose it or use it for any other purpose.
- Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.
- You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. See this link: https://tools.google.com/dlpage/gaoptout
- For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <u>https://policies.google.com/privacy?hl=en</u>

# Third party providers – Targeting and Remarketing

- we may also use third party vendors for remarketing. This allows us to advertise to you on third party websites after you leave our website. We may do this via cookies and Facebook pixels located on our website.
- Most third party vendors allow you to opt-out or amend your settings. You can do this for Google by using the following link: http://www.google.com/settings/ads and for Facebook by clicking here <a href="https://www.facebook.com/help/568137493302217">https://www.facebook.com/help/568137493302217</a>
- Some third party vendors allow us to create Custom Audiences feature so that we can target advertising at you. If you wish to opt out of this please contact us.

#### **Email Communications**

If you register with Swapology.co.nz or sign up for any of our newsletters or alerts, we will send you information about activities we feel may interest you.

Additionally, we may allow any third party which acquires us or a substantial part of our assets, to contact you directly with information which you may find useful regarding their products and services.

You can unsubscribe from receiving our newsletter and other correspondence by clicking the "Unsubscribe" link featured within our correspondence. Alternatively, you can edit your personal information or manage notification subscriptions by updating your account settings within your user profile.

#### Where we Store Your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside New Zealand. we will take reasonable steps to ensure that any transfers of your data are compliant with applicable data protection and privacy laws. we will also implement reasonable technological and measures to ensure that once transferred outside of New Zealand, your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our (or our third party service providers') secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of Swapology.co.nz, you are responsible for keeping this password confidential.

The transmission of information via the internet is not completely secure. We will do our best to protect your personal data, however, we cannot guarantee the security of your data transmitted to Swapology.co.nz; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

# **Disclosure of Your Information**

We may disclose your personal information to other third parties in the circumstances set out below.

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If we or a substantial part of our assets are acquired by a third party, your personal data may be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the terms and conditions of Swapology.co.nz, to protect the rights, property, or safety of Swapology, organisers of activities listed on Swapology.co.nz, or other users of Swapology.co.nz.
- We may share aggregated user information with third parties, such as advertisers and content distributors. For example, we may disclose the number of a particular category of users (e.g. women aged under 35) that have been exposed to, or clicked on, advertisements in a particular period.

• We may share information submitted as part of third party promotional activities only when you agree the specific terms and conditions of the promotion by opting in to the promotion.

## **External Links**

Swapology.co.nz may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Access to Information**

You have a legal right to a copy of all personal information about you held by us. Your right of access can be exercised in accordance with the Act.

## Changes to our Data Protection and Privacy Policy

Any changes we may make to our data protection and privacy policy in the future will be posted on this page and, where the changes are material, the changes will be notified to you by email.

This privacy policy was last updated on 13 October 2020.

## Contact

Please email us at hello@swapology.co.nz if you are unsure about any of the information listed above or have further questions or comments regarding this privacy policy