

# InfiDigi Privacy Policy

This Privacy Policy applies to information collected by *InfiDigi Limited* (associated brand PayItNZ) and its associated companies. It sets out how InfiDigi collects, stores and uses your information and how you can access and update your personal information or make a complaint.

Unless otherwise notified to you that your personal information will be used in a more limited way (e.g. in a website or form seeking personal information from you), all personal information collected by InfiDigi is held and used in accordance with this Privacy Policy.

## 1. How Personal Information is Collected

This Privacy Policy applies to personal information of individuals that InfiDigi collects via the following:

*InfiDigi, PayItNZ and associated websites* - any consumer-directed websites operated by InfiDigi, including InfiDigi owned websites and websites that we run on third party social networks such as Facebook (e.g. Facebook fan page).

*InfiDigi, PayItNZ and associated mobile sites/apps* - any consumer-directed mobile sites or applications operated by InfiDigi, including our smartphone apps (e.g. iPhone apps).

*InfiDigi, PayItNZ and associated text messaging programs* - any consumer-directed text messaging programs operated by InfiDigi which may be advertised on one of our websites, applications or in a print advertisement.

*InfiDigi, PayItNZ and associated forms* - including hardcopy registration forms that we may collect from individuals via post, or personally.

*Support Services* - any personal information that we may collect from consumers through our Support Services contact centre, e.g. if you call us with a question or comment or to ask for assistance.

*Social networking sites* - any personal information that we may collect when you interact with third party social networking features such as “Facebook Connect” or “Facebook Like”. These features may be integrated in our sites or applications. If you use these features, we may have the ability to obtain certain information about you from your social networking profile.

*Data from third parties* - Although InfiDigi generally only collects personal information directly from individuals we may obtain personal information about you from other sources such as third-party data aggregators engaged to provide us with additional information about our existing consumers or from third parties with whom we may occasionally partner with to run promotions.

## 2. Personal Information Held by InfiDigi Associated Brands and Its Associated Companies

InfiDigi associated brands and its associated companies only collect personal information that is necessary for registration of its products and/or services of its business functions. We may combine personal information that we collect via one method (e.g., a website) with personal information that we collect via another method (e.g. an offline event). Personal information collected includes the following:

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Personal contact information - any information that would allow us to personally contact and verify you for identity verification and compliance, such as your name, addresses, phone numbers or email addresses.

Account login information - any information that is required for you to establish a unique account with us or for us to give you access to your specific account profile.

Technical computer information - any information about a computer system or other technological device that you may be using to access one of our websites or applications.

Consumer/Customer feedback - any information that you voluntarily share with us about your experience in using our products and services, including our websites and applications. Examples may include unsolicited comments and suggestions, testimonials, or other questions or feedback related to our products.

Consumer-generated content - any content that you create and then share with us and perhaps others, by uploading it to one of our websites or applications, including one of our Facebook sites.

Social network information - any information that is part of your profile on a third party social network (such as Facebook) and that you allow the third party social network to share with us (examples: name, email address, gender, birthday, profile picture and any other information you allow to be shared). We may use this information to match information with a social network for advertising purposes.

## 3. Purposes for which Personal Information is Collected

InfiDigi may collect and use your personal information for some or all of the following purposes. Please note that not all of the uses below will be relevant to every individual.

Marketing communications - Where you have opted-into receiving marketing communications about InfiDigi we may collect and use your personal information to keep you up to date with the latest news, events, special offers and promotions of our brands as follows:

General marketing communications - to send you communications such as emails, SMS text messages and postal mailings.

You can always opt-out from receiving marketing communications by following the unsubscribe instructions provided in each such communication or by contacting us on (09) 8899 552.

You may also visit social media sites where you are a member to explore opt-out options they may provide for targeted advertising. Please note that even if you opt-out from receiving marketing communications from us, you may still receive administrative communications from us (such as notifications about your account activities). You will also still see generic ads on other websites, including on social media sites where you are a member.

Account maintenance - We may collect and use your personal information to maintain your accounts with us.

Consumer/customer service - We may collect and use your personal information to provide you with customer service, including responses to your inquiries, complaints and general feedback about our products. Customer service may be provided through various forms of communication, including via email, letter, telephone and online chat features.

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Product improvement and customisation - We may collect and use your personal information so we can constantly improve our products, tailor them to your needs, and come up with new product ideas and inform you of any changes to our products.

Consumer engagement - We may collect and use your personal information to get you more actively engaged with our products and services (including our websites and applications), thereby increasing overall brand engagement and awareness. This mostly involves the collection, use, and publication of consumer-generated content.

## 4. Disclosure of Personal Information

InfiDigi will share your personal information with only our partner companies so that they can contact you to share any information or offers that may be of benefit to you.

Service Providers, Agents and Contractors - We may use third parties, like service providers, agents or contractors to provide support for our business functions (such as internal operations of our websites and applications, database or website hosting, including cloud infrastructure, etc). Your personal information may be accessed by InfiDigi's service providers located outside of New Zealand in countries including China, Australia, India, Philippines, United States, Canada or be stored by them in such countries.

Partners and Joint Promotions - From time to time, we may run a joint or co-sponsored programme or promotion on our website or application with other companies, and, as part of this event, collect and process personal information. Your personal information will then be shared with our third-party companies.

Legal requirements and business transfers - We may also disclose your personal information if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the safety or rights of InfiDigi, its customers, or the public.

In the event of a merger or acquisition of all or part of InfiDigi, or in the event that InfiDigi were to sell or dispose of all or a part of the InfiDigi business, the acquirer would have access to the information maintained by that InfiDigi business, which could include personal information.

## 5. Security and Storage of Data

We take all reasonable technical and organisational measures to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse.

We will only keep your personal information for as long as it is reasonably necessary taking into consideration our need to answer queries or resolve problems, provide improved and new services and comply with legal requirements under applicable laws. This means that we may retain your personal information for a reasonable period after you stop using InfiDigi services or stop using our websites or applications. When the personal information that we collect is no longer required, we destroy or delete it in a secure manner, in accordance with best practice for document and data destruction.

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Third party data security – Where InfiDigi does disclose personal information to a third party as specified in point 4 above, any such third party must at all times also take care of security for your personal information.

## 6. Accessing and Correcting Your Personal Information

You can review or update any personal information we hold about you on our online portal, User Profile section or you can contact us on [info@payitnz.co.nz](mailto:info@payitnz.co.nz) and request us to update your information.

## 7. How to Make a Complaint and How Complaints Will Be Handled

If you are concerned about a possible interference with your privacy or misuse of your personal information by InfiDigi, please contact us on [info@payitnz.co.nz](mailto:info@payitnz.co.nz).

It is InfiDigi's policy to handle complaints in a timely, effective, fair and consistent manner. On making a privacy complaint to InfiDigi, you will receive an acknowledgment letter or email within 5 business days. This communication will set out the name of the person responsible for handling your complaint and the expected response time to the complaint. InfiDigi endeavours to make a decision on all written complaints within 20 business days after a complaint is received. If we need more time to respond to your complaint we will notify you as to the delay, the reasons for it and seek your agreement to a longer period.

## 8. Privacy Policy Updates

This Privacy Policy was updated in August 2017.

We reserve the right to make changes to this Privacy Policy at any time. We encourage you to regularly review this Privacy Policy to make sure you are aware of any changes and how your information may be used.