

## **Privacy Policy**

This Privacy Policy should be read in conjunction with our Terms of Service and governs our policies and practices with respect to the Personal Information data that is collected by Us&Co Talent Limited ("Populr", "we", "us" and/or "our") in connection with our website, located at [www.populr.co](http://www.populr.co) and our mobile applications and related services (together with the Site, the "Service(s)"). By using our Services you are consenting to our using or accessing information in any way, including, but not limited to, collecting, storing, deleting, combining and disclosing your Personal Information and data as set out in this Privacy Policy now and as amended. We are bound by the New Zealand Privacy Principles contained in the Privacy Act 1993 (Act) (subject to exemptions that apply to us under that Act) 1993. We may, from time to time, review and update this policy, including taking account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recently updated policy.

### **Changes to our privacy policy**

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. You will be notified of any change the next time that you log in to our website after the change has taken place.

### **What is considered personal information?**

When used in this policy, the term "Personal Information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses). If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## **What personal information do we collect and hold?**

We may collect the following types of personal information:

Name;

Mailing or street address;

Email address;

Telephone number;

Age or birth date;

Profession, occupation or job title;

Any additional information necessary to deliver the Services and to respond to your enquiries;

Any additional information relating to you that you provide to us directly through our Services or indirectly through use of our Services.

## **Cookies**

In some cases we may also collect your personal information through the use of cookies.

When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website, without bothering you with a request to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may also log IP addresses (the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user movements, and gather broad demographic information. We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use

this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the New Zealand Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

### **Social media services**

To use the Services, you may be required to enable or log in to the Services via certain online third party services, such as Twitter or Facebook ("Social Media Services"). To take advantage of this feature and capabilities, we may ask you to authenticate, register for or log into Social Media Services on the websites of their respective providers (you will provide your login information, like your password, directly to such Social Media Services, and not to Us). As part of such integration, Social Media Services will provide us with access to certain information that you have provided to such Social Media Services. When you do so, you are sharing information with those Social Media Services, and the information you share will be governed by their privacy policies and terms of service. You may also be able to modify your privacy settings with these Social Media Services to, for example, control what information the Social Media Services disclose to third parties like Populr. When you log into the Services using your Social Media Services account, we will collect relevant information necessary to enable our Services, but you will provide your login information, like your password, directly to such Social Media Service (and not to Populr). As part of such integration, the Social Media Service will provide us with access to certain information that you have provided to such Social Media Service, and we will use, store and disclose such information in accordance with this Privacy Policy and, if and to the extent applicable, the policies of such Social Media Services. Please remember that the manner in which Social Media Services use, store and disclose your information is governed by the policies of such third parties, and we shall have no liability or responsibility for the privacy practices or other actions of any Social Media Services.

## **Why do we collect personal information?**

The primary purpose for which we collect information about you is to enable us to perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

To provide services to you and our clients;

To provide you with news, information or advice about our existing and new products and services;

To communicate with you including by email, mail or telephone;

To manage and enhance our products and services;

To personalise and customise your experience;

To provide you with access to protected areas of our websites;

To verify your identity;

To provide as part of business data to third parties if you have authorised us to do so;

To conduct business processing functions for operation of our websites or our business; for our administrative, marketing (including direct marketing), promotional, planning, product/service development, quality control and research purposes, or those of our contractors or external service providers;

To provide your updated personal information to us, our contractors or external service providers;

To investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or

As required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

### **What happens if we can't collect your personal information?**

If you do not provide us with the personal information described in this policy, we may not be able to provide you with the products or services you requested, either to the same standard, or at all (for example, if you do not register as a member of a website, you will not be able to access features or services that are reserved for members only)

### **How do we disclose your personal information?**

We may disclose your personal information to:

Our employees, related bodies corporate, contractors or external service providers for the operation of our websites or our business, fulfilling requests by you, and otherwise provide products and services to you, including without limitation, web hosting providers, IT systems administrators, mailing houses, data entry service providers, electronic network administrators, debt collectors, and professional advisers such as accountants, solicitors, business advisors and consultants;

Our existing or potential clients, business partners or joint venture entities or partners authorised by you to receive information held by us;

The police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary;

As required or permitted by any law (including the Privacy Act).

### **How can i access and correct my personal information?**

You may request access to any personal information we hold about you at any time by contacting us (details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

We will not charge for simply making a request and will not charge for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it. Members of our websites will generally be able to access and update their membership details online. We request that you keep your information as current as possible so that we may continue to improve our service to you.

### **Our policy towards children**

If a parent or guardian becomes aware that his or her child has provided us with Personal Information without his/her consent, he or she should contact us at [james@populr.co](mailto:james@populr.co). We do not knowingly collect Personal Information from children under 13. If we become aware that a child under 13 has provided us with Personal Information, we will delete such information from our files. If you are under the age of 13, please do not submit any Personal Information through the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Information via the Services without their permission.

## **Will my personal information be disclosed outside New Zealand?**

Our servers are located in the United States. By using the Services, you acknowledge and agree that your Personal Information will be transferred to the United States, and processed and stored in the United States. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

## **Security**

We will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access and secure servers. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

## **How you i complain about a breach of privacy?**

If you believe your privacy has been breached by us, have any questions or concerns about our Privacy Policy please, contact us using the contact information below and provide details of the incident so that we can investigate it.

We have a formal procedure for investigating and dealing with privacy breaches. Once the Privacy Officer receives a complaint, whether it is in writing or verbal means, the Privacy Officer will commence an investigation with the relevant business unit from which the alleged breach stemmed. The investigator will endeavour to determine the nature of the breach and how it occurred.

We may contact you during the process to seek any further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer

Us&Co Talent Limited

Suite 402, 8 Commerce Street, Britomart, Auckland

[privacy@populr.co](mailto:privacy@populr.co)