

## **Sanem Investments Privacy Policy**

*Please read this document carefully.*

We collect personal information, information about an identifiable individual (a natural person) to be able to contact you and respond to your queries about Sanem Investments Limited.

This Privacy Policy sets out how Sanem Investments Limited (“we”, “us”, “our”) collects, uses, stores and shares personal information of users collected through use of our website and services, and other digital platforms (the “Services”) and in any other interactions with you. We may also collect, use and disclose information to the extent applicable law does not prohibit it.

By providing us with your personal information, you agree to the collection, storage, use and disclosure of your personal information. If you do not agree, you may not be able to use the Services.

This Policy does not apply to information collected through third-party websites or services that you may access through the Services or that you submit to us through email, text message or other electronic message, or offline.

**IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY THEN PLEASE DO NOT USE ANY OF THE SERVICES.**

### **1. Eligibility**

Our Services do not address and we do not knowingly collect personal identifiable information from children under the age of 13. If we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

### **1. What kind of Information do we collect?**

Information we collect may include personal information about you. The personal information we collect may include:

- (x) identity information such as your name, telephone number, email address, postal address;
- (x) marketing information including your preferences for receiving marketing communications and details about your engagement;
- (x) responses to surveys you asked to participate in;
- (x) if you contact us via our website or by phone, we may receive additional information about you. For example, we will receive your name, email address, phone number and, we may keep a copy of the correspondence;
- (x) details of your visits to our websites including, but not limited to, traffic data, location data, and other communication data, whether this is required for our own billing purposes or otherwise, and the resources you access;
- (x) any other information that you voluntarily provide to us.

## **1. Use of information**

Your personal information may be used by us (and our employees, officers, agents, contractors, partners and affiliates) for any purpose which is stated to you at the time of collection or that you otherwise authorise and for the following purposes:

- (x) to provide you with the services you have requested;
- (x) to assess and improve the quality of our products and services;
- (x) to assist in providing better services to you by tailoring them to meet your needs;
- (x) to conduct marketing, promotional and publicity purposes including direct marketing, market research, analysis and surveys;
- (x) to respond to comments, questions and requests;
- (x) to send you technical Policies and other administrative messages;
- (x) to contact you (including email and other electronic messages);
- (x) to assist us in performing our functions and activities;
- (x) to communicate and manage our relationships with stakeholders;
- (x) to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
- (x) we may use or share your personal information with your consent such as when you instruct us to take a specific action with respect to personal information, to post a review or testimonial, or you opt into third party marketing communications.
- (x) analysis in aggregate form (identifiable characteristics removed so that you will remain anonymous);
- (x) to comply with our legal obligations.

## **1. Information Sharing and Disclosure**

We may disclose your personal information:

- (x) within the organisation for the purposes set out in this Policy;
- (x) to other third parties in accordance with the uses set out in this Policy;
- (x) if you have requested or authorised us to do so;
- (x) when we believe it is appropriate to comply with the law, facilitate court proceedings or to protect our rights;
- (x) to those who need it to do work for us, who may include third parties to administer and provide the Service on our behalf (customer support, hosting, email delivery and database management services), as well as lawyers, bankers, auditors, and insurers.
- (x) when we believe your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property, and safety of you, us, or others;
- (x) in connection with, or during negotiations of, any merger, sale of our assets, financing, or acquisition of all or a portion of our business to another company;
- (x) where we are authorised or required to do so by law, regulation or legal process;
- (x) intermediaries including your agent, adviser, broker, a representative acting on your behalf with your consent, or our authorised representatives and our agents; and
- (x) by sharing aggregated demographic information about our user base with our affiliates, partners and advertisers.

### **1. Access to, correction, modification and deletion of your information**

You are entitled to obtain confirmation from us that we hold personal information about you and can request access to the personal information by contacting us. In some circumstances, as provided for under relevant legislation, we can deny your request for access to personal information. If we deny your request, we will tell you why. We will normally get back to you with a response within 20 working days. If accessing your personal information will take an extended period; we will inform you of the delay. For more detailed requests for access to information, an administration fee may be charged to cover the associated cost of supplying this information, but we will discuss this with you before we go ahead. If you believe the information that we hold about you is incorrect, you may ask for it to be corrected. If we decline to correct the information, you may request a statement be attached to the information that a correction was sought but not made.

You can submit these requests by email to [info@saneminvestments.co.nz](mailto:info@saneminvestments.co.nz). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or response to your requests regarding your personal information, you may contact us at [info@saneminvestments.co.nz](mailto:info@saneminvestments.co.nz) or submit a complaint to the relevant data protection regulator.

### **1. Personal Information Storage**

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at [info@saneminvestments.co.nz](mailto:info@saneminvestments.co.nz).

We will retain your personal information for no longer than is required for the purpose for which the information was initially collected and where necessary to comply with our legal obligations. In addition, we retain personal information to comply with applicable law where required, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, and other actions permitted by law. We take reasonable steps to ensure that your personal information is protected against loss, unauthorised access, use, disclosure, alteration or destruction.

We adopt policies and procedures to protect your personal information, and we review these regularly. We employ industry standard security measures designed to protect the security of all information submitted through the Services. However, the security of information transmitted through the internet can never be guaranteed. We are not responsible for any interception or interruption of any communications through the internet or for changes to or losses of data. Users of the Services are responsible for maintaining the security of any password, biometrics, user ID or other form of authentication involved in obtaining access to password protected or secure areas of any of our digital services. To protect you and your data, we may suspend your use of any of the Services, without notice, pending an investigation, if any breach of security is suspected.

### **1. Consequences for failure to provide personal information**

You may decide not to provide your personal information to us. However, if you do not provide it, we may not be able to provide you with access to the Services or certain parts of the Services or you may not be able to fully utilise all our products and services.

## **1. Automatic Data Collection Technologies**

We may use automatic data collection technologies to collect certain information about how you use our Sites. Some information may be linked to you personally. Examples of this information include:

- (x) website related traffic data, location data, logs and other communication data;
- (x) data related to your use of the Services. This includes the pages you visit, the services that you access; the time you spend on each page, the date and time of your visit, referring pages (pages you came from or go to), and statistical and other aggregated data derived from your use of the Services;
- (x) information about your device, computer and network connection, including your IP address, operating system, hardware version and browser type; and
- (x) if you allow our Services to deliver content based on your location (for example by enabling this feature on your mobile device) we may collect location data (such as through GPS, Bluetooth, or Wi-Fi signals) including for the automated delivery of relevant content and advertising to you.

The technologies we use for this automatic data collection may include log files, usage monitoring software and cookies. Cookies are small pieces of information that are stored on a user's device that can identify the device from which you are working. The cookie file gives us details such as your IP address, platform, browser and domain. We may use the information generated by cookies to personalise your experience on the Services and improve your experience by storing your search, posting and other viewing and usage history, and your login details (if you choose) enabling you to use certain services as a registered user without having to log on each time. We may also use cookies to provide you with certain advertisements which may be of interest to you. If you disable cookies, it may limit your access the Services' content and features.

You can choose to refuse cookies by turning them off in your browser and/or deleting them from your hard drive. You do not need to have cookies turned on to use our Services, but your experience may be affected.

## **1. Other Tracking Technologies**

We may advertise in various ways, including online through managed social media presences, and on other unaffiliated sites and mobile applications. To understand how our advertising campaigns are performing, and better understand the visitors to our Services, we may collect certain

information via our Services through our advertising service providers. We use common online tracking tools to collect information about our users, such as browser cookies, web beacons, and other similar technologies. The information we collect includes IP addresses, the number of page visits, search engine referrals, browsing activities over time and across other websites following your visit to one of our Services or applications, and responses to advertisements, campaigns and promotions on the websites and applications where we advertise.

We also store data locally on your device to enhance the user experience for our Services and services. For example, browser local storage allows us to save the state of your current page so that when you return later or refresh the browser, the page will remain the same.

We may also collect information from your mobile device, such as, but not exclusively, the first time the mobile application is opened, mobile carrier, the versions used, and the type of device that is being used, if you have downloaded our applications. This information is used to help us deliver the most relevant information to you and improve our services and Services. Examples of information that may be collected and used include how you use the Services and information about the type of device you use. In addition, in the event our mobile applications crash on your mobile device, we will receive information about your mobile model and OS version, which allows us to identify and fix bugs and otherwise improve the performance of our Services. We send you push notifications from time-to-time such as reminders for any support sessions. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

### **1. Third Parties, Advertising and third-party links**

We may allow third-party companies to place ads and collect information when you visit our Services. This may include information that will not identify you personally (such as click stream information, browser type, time and date, subject of advertisements clicked or scrolled over) and other information such as precise geo location and user device identification. This information is collected to provide advertisements about goods and services likely to be of greater interest to you. The Services may also contain links to a variety of advertising and third-party services. These links may request or record information from users, use cookies or other methods to collect information from you. We have no control over the content or Privacy Policy practices of such sites. We encourage you to review the privacy policies of such sites before engaging in any activity with them.

## **1. Marketing**

We would like to use and disclose your personal information to keep you up to date with the range of products or services available from us. You consent to us sending you information connected with the above collection and use purposes via email or text message when you provide us with your email address and/or mobile phone number. We may also send you other information we think you may be interested, and which may market and promote the Services, or the products and services of our subsidiaries, related or joint venture companies. The messages you receive from us will have instructions for how you can remove yourself from our mailing list. Electronic marketing will only be sent to your email address or mobile phone number if you have given your consent. You may unsubscribe to any email marketing message at any time by following the unsubscribe instructions contained in the message.

## **1. Use for New Purposes**

We may use your personal information for reasons not described in this Privacy Policy, where we are permitted by law to do so and where the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis for that use. If we have relied upon your consent for a particular use of your personal information, we will seek your consent for any unrelated purpose.

## **1. Contact Us**

If you require more information or clarification on our privacy policy, please do not hesitate to contact our Privacy Officer at [info@saneminvestments.co.nz](mailto:info@saneminvestments.co.nz).

This Privacy Policy was last updated on 18/5/2022