

PRIVACY POLICY

Last updated April 2021

We are committed to ensuring your privacy is protected and to complying with our obligations under the Privacy Act 2020.

The purpose of this Privacy Policy is to tell you how we manage your personal information.

By providing us with your personal information when using our services, you acknowledge that you have read and understood this Privacy Policy and consent to our use of your personal information in accordance with the terms set out in this policy (as amended from time to time).

The terms “we”, “us” and “our” are a reference to SiteAppPro Limited. References to “you”, “your” and “client” are a reference to you.

1. What is personal information?

Personal information means any information that directly or indirectly allows for the identification of a natural person. It may include, but is not limited to:

- your name, physical address, email address and telephone number;
- payment information;
- support queries and requests; and
- information about your company such as the name, size and location of your company and your role within the company.

If you can't be identified (for example, when personal information has been aggregated and anonymised) then this Privacy Policy does not apply.

2. Collection of personal information

We collect and use personal information provided by you when you engage us to provide services to you or through your use of the Site App Pro application (“**Application**”), including where you scan a Site App Pro QR code. We use the information you provide to us to provide you with the product or service you request. We will not collect personal information if it is not necessary to provide you with our services or for you to use the Application.

When you use our services or use our website or the Application, we might ask you to provide personal information to us. The failure to provide such personal information may make it impossible for you to use the Application. In cases where the Application specifically states that some personal information is not mandatory, you are free not to communicate this personal information without consequences to

the availability or the functioning of the Application. If you are uncertain about what personal information is required for full use of the Application, you are welcome to contact us.

Wherever it is possible and practical to do so, we will collect personal information directly from you. This may be in person, over the telephone, by email, via the Application, over the internet or by completion of a form (such as an application form and including a digital form).

When you visit our website or use the Application, we may record general information about your visit and usage for statistical purposes, such as your IP address and what features you used. Some of this information is collected using cookies. These statistics do not contain any personally identifiable information. Where such statistics do allow us to identify you, they shall be treated as personal information and this Privacy Policy shall apply.

We may collect personal information about you from third party service providers only when you have agreed to the release of such personal information to us. We will not otherwise collect any personal information about you unless we have your permission or you knowingly give us the information.

3. Use of personal information

We may use your personal information in the following ways:

- for the purpose of providing our services and communicating with you in relation to those services, such as providing support services or responding to your inquiries;
- marketing communications, in accordance with your marketing preferences;
- operational communications, such as changes to our website, the Application, our terms of use and this Privacy Policy;
- to assist us in developing and improving our services and the Application;
- to enforce our rights where necessary, in accordance with any contract or other terms and conditions to which you are subject;
- if you provide testimonials or reviews, to publish that content on our website and social media platforms; or
- in accordance with our legal obligations.

4. Disclosure of personal information

In the course of providing our services, we may need to disclose your personal information to certain third parties, including:

- other companies in the Comply Pro group of companies;
- third party services providers who assist and enable us to use the personal information, for example, our payment providers and marketing partners; and
- to such persons that you may have agreed to provide your personal information to.

Where you have scanned a Site App Pro QR code or log in to a worksite using the Application, the personal information you provide will be made available to the relevant manager or administrator of that worksite. Any such manager or administrator is subject to Site App Pro's Terms and Conditions of Use.

We may not disclose your personal information to overseas third parties unless the jurisdiction of that third party provides similar safeguards to those in the Privacy Act 2020.

We may disclose your personal information if required to do so by law. We may also disclose information about someone whose activities could cause harm to themselves or others (i.e. fraud). Where possible and appropriate, we will notify you of this type of disclosure.

5. How we protect your personal information

We understand the importance of protecting the personal information we hold about you. The information you provide us is only made available to our staff on a 'need to know' basis and for the purposes outlined above or to third parties as outlined in this Privacy Policy who have agreed to treat that information confidentially.

We take steps to ensure your personal information is free from misuse, interference, loss, unauthorised access or modification by:

- securing personal information both in physical and electronic form;
- limiting access to personal information only to those that need access to it for the purpose of providing you with our services; and
- protecting our systems with appropriate technology solutions.

While we cannot ensure or guarantee that loss, misuse or alteration of personal information will not occur, we use our best efforts to prevent this.

6. Accessing your information

You have a legal right to a copy of all the personal information we hold about you. You also have a right to request access to the personal information we hold about you or request us to correct the personal information we hold about. You may exercise these rights by emailing us at Privacy@complypro.co.nz

7. How long we hold your information for

We will keep your personal information only for as long as necessary to achieve the purpose we collected it for and in all cases for such periods as we are required to in order to comply with any relevant legislation or regulations.

8. Changes to this policy

We reserve the right to modify or amend this Privacy Policy from time to time for any reason. If we make any significant changes, we will provide you with reasonable notice of such changes via email.

9. How to get in touch with us

If you have any questions on this Privacy Policy or on any personal information we have collected, you can contact us at Privacy@complypro.co.nz