



Privacy Notice

Last updated: October 2021

1. Who are we?

This is the Privacy Notice for Cogo, a fintech-for-good application on a mission to empower conscious consumers and help them make sustainable and ethical choices as to where they spend their money and to help offset their CO2e emissions. A user may use the Cogo app to search and view businesses around them that align with their values, and connect their bank transaction history to view their ethical wallet and receive purchasing suggestions (Both are referred to in this policy as our “**service**” or “**services**”).

Cogo is owned and operated by Cogo Connecting Good Limited in New Zealand with registered address at 81 Abel Smith Street, Wellington, 6011, New Zealand, company number 5957234, and in Australia by Connecting Good Australia Pty Limited with registered address % PO Box 2136, St Kilda West, VIC 3182, Australia, ABN: 42 647 475 107. When we refer to our trading name “**Cogo**” or “**we**”, “**us**” or “**our**” in this policy, we are referring to both Cogo Connecting Good Limited and Connecting Good Australia Pty Ltd. We are the data controller for the information we collect from you, or you provide to us, meaning that we will determine the purposes and methods that your personal data is processed.

2. Purpose of this Privacy Notice

This Privacy Notice intends to provide you with information about how we, as a data controller, may collect and process information we collect from you, or that you provide to us in accordance with applicable data privacy laws. We want you to be confident that when you use Cogo products and services, you understand what personal information we are collecting, how we are using it, and how we are keeping it safe.

“**Personal data**” is any information that can be used to identify you or that we can link to you.

3. Getting in touch

If you have any questions, comments or suggestions relating to this Privacy Notice, you can reach us at privacy@cogo.co, or write to us at:

- **UK:** Cogo Privacy Officer, % Herschel House, 58 Herschel Street, Slough, SL1 1PG
- **NZ:** Cogo Privacy Officer, 81 Abel Smith St., Wellington, 6011, New Zealand
- **Aus:** Cogo Privacy Officer, % PO Box 2136, St Kilda West, VIC 3182, Australia

If you have any concerns, or if you have any unresolved privacy issues, you have the right to

lodge a complaint with the relevant supervisory body:

- United Kingdom: [Information Commissioner's Office](#) (ICO)
- New Zealand: [Privacy Commissioner Te Mana Mātāpono Matatapu](#) (PC)
- Australia: [Office of the Australian Information Commissioner](#) (OAIC)

We welcome the chance to deal with any concerns in the first instance and would love you to get in touch.

4. When this Privacy Notice applies

This Privacy Notice applies when you use the Cogo Services (Including the Cogo mobile application, the Cogo website, or any other online service created or hosted by us from time to time on which this Privacy Notice appears).

Additionally this Privacy Notice applies

- where you apply to us for a job or work placement;
- your supply of services to us where this involves any personal data; and/or
- to any personal information collected from third parties where we are the controller of such information.

This Privacy Notice does not apply to, and Cogo is not responsible for, any third party websites which may be accessible through links from this website.

5. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us in person, by email, by phone, by post or otherwise. This includes personal data you provide when registering to use our service.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see section 11 on Cookies for further information.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources, for example, analytics providers such as Google, or Social Media Platforms. For more information see section 8 'Analytics and advertisements' Any information gathered through these channels will be governed by the privacy settings, policies, and/or procedures of the applicable platform, which we strongly encourage you to review.

6. How we use your personal data

We use your personal data only when it is required.

This includes:

- **Contract:** Where we need to perform the service you have signed up for, i.e to offset your CO2e emissions through Cogo’s website.
- **Consent:** Where we have your prior consent to use your personal data (for example, where you have consented to receiving marketing).
- **Legitimate Interest:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Legal –** Where we have a legal or regulatory responsibility to do so.

Below is a table of our intended use of your personal data, our lawful basis for processing it in this way, and the types of data we will process in order to fulfill this purpose. Wherever possible we will not process your data, however we may not be able to do some or all of these things below without doing so.

If at any time we intend to change the purpose for which we hold your personal data, for example to offer you with a complimentary service that we may provide in the future, we will give you prior information of that new purpose so you are aware of this.

Purpose / activity	Our lawful basis for processing this data	Type(s) of Data we use for this purpose
To register you to use the Cogo Service	Contract	Registration Information
To manage our relationship with you (including notifying you about changes to our terms and conditions or this privacy policy)	Contract; Legal obligation	Email address
To understand our user base better	Legitimate interests (to understand our user demographic and what users want to get out of our service)	Registration Information, Additional Personal Information
To create anonymised and	Legitimate interests. (To	Anonymised and aggregated

aggregated market research	communicate the spending behaviour of groups of consumers to people and organisations that want to understand consumer spending behaviour and who are members of Cogo)	Registration information, Account and Transactional information and Technical information
To communicate with you about businesses that you have shopped at, or may shop at who are aligned with your values.	Contract; Consent	Email Address
To carry out our obligations arising from any contracts entered into between you and us.	Contract	Email Address, registration information, Additional Personal Information, Location services
To facilitate our internal business operations, including to fulfil our legal or regulatory requirements and to maintain and update our records	Contract, Legal obligation	Email Address, registration information, Additional Personal Information
For our business purposes, including data analysis, submitting invoices, detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.	Contract, Legal obligation	Email Address, registration information, Additional Personal Information
To provide user support and technical instructions regarding your account	Contract	Registration information, Account and Transactional information and Technical information
To monitor and improve our services	Legitimate interests (to track the use of our service and identify areas where we can improve service performance or service functionality. This includes business and technical improvements)	Registration information, Technical information, Additional Personal Information

To provide you on an ongoing basis with information and services, including relevant marketing communications related to Cogo, and other information or materials	Consent	Registration information, Technical information, Additional Personal Information
Use of necessary, functional and analytical cookies	Legitimate interests (in operating our website); Consent	Technical information
As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.	Legal	As required by law

7. Connecting your bank account

If you choose to connect your bank account(s) to your Cogo account, you authorise Cogo to securely retrieve transaction information from your linked account. By connecting your bank accounts to the Cogo app, Cogo has 'read only' access in order to provide our services, such as the carbon footprint tracker, and has no access or ability to process payments. Your banking credentials are never known, stored, or disclosed to Cogo. You will never be asked to share your password or login details with anyone other than your own bank or building society.

Safe. Secure. Simple.

8. Sharing your location

If you choose to provide permission to access your location data, the Cogo app collects this information only while the app is running in the foreground. You may change your location permissions at any time through your mobile phone's settings menu, however if you chose not to share your location data with Cogo then we will be unable to provide you with parts of the service. We may use an aggregate of your location data to approximate your location in order to provide you with our service. Cogo does not share this information with any affiliates or third parties, except as outlined in this Privacy Notice, and as part of anonymised market analysis.

9. Analytics and advertisements

As with most companies, Cogo engages with third party providers for analytics and advertising

information. Any information gathered through these channels will be governed by the privacy settings, policies, and/or procedures of the applicable platform. Below are some of the main analytics and advertising partners Cogo uses, along with information about how you can review and/ or opt out of their services.

Analytics

We use third party analytics providers, including Google, Amplitude and others, to collect information about the usage of our online services and enable us to improve how these online services work. The information allows us to see the overall patterns of usage across our services, helps us record any difficulties you have with our services, shows us whether our advertising is effective or not, and allows us to use responses to advertisements to optimize ad performance. Google Analytics, Amplitude and others use cookies and other similar technologies to collect information about the usage of our online services and to report website and mobile application trends to us, without storing any personal data on external third-party analytics provider platforms.

You can opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>

Personalised and behavioural advertising

We may sometimes participate in third party advertising partners (such as Google, YouTube, Facebook) in remarketing and behavioural targeting programs. These services allow us and our partners to display ads that are likely to be more relevant (such as behavioural or targeted ads that are based on information about your browsing history). This activity is performed by tracking usage data and by using cookies to transfer information to the partners that manage the remarketing and behavioural targeting activity.

For opting-out of ads served by Google, visit <https://support.google.com/ads/answer/2662922?hl=en>. For opting out of a range of advertising networks, visit <http://optout.networkadvertising.org>.

Facebook (includes Instagram)

We may sometimes participate in Facebook.com's Custom Audience program which enables us to display personalized ads to persons on our email lists when they visit Facebook.com. We do not share any of your personal information with Facebook. The Customer Audience Tool lets us convert your email address to a unique number that Facebook uses to match to unique numbers Facebook generates from emails addresses of its users. You may opt-out of participation in our Facebook Custom Audience by sending an email, from the email address you are opting out of, to the email address provided in our contact information below.

We also use a piece of code called the Facebook pixel, which allows us to track how you are using our website and mobile application. The pixel allows us to measure the effectiveness of our advertisements, analyse the effectiveness of our services, and optimise what ads you see from us.

You can manage what advertising from Facebook by logging into Facebook and going to https://www.facebook.com/settings/?tab=ads#_.

10. Disclosure of Your Information

In order to provide you with your service, and to maintain our business activities, we may exchange your personal data in the following ways.

- To third-party service providers (data processors) contracted to Cogo. These companies are authorised to use your personal information only as necessary to provide these services to us, and via contractual agreements that establish their responsibilities to protect your data;
- To regulators, authorities or bodies who require reporting of processing activities in certain circumstances. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, or investigate fraud;
- To professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- Anonymous statistical information about users of our websites and related usage information to reputable third parties, including analytics and search engine providers;
- To any other third party with your prior agreement to do so, where such agreement will be recorded by us, and retained in line with our data retention policy, and include the purpose, frequency and duration of the information sharing.

When such third parties no longer need your personal data to fulfil this service, they will dispose of such details in line with Cogo's procedures unless they are themselves under a legal obligation to retain information (provided that this will be in accordance with applicable data privacy laws). If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We own the database rights in the information collected via our online services. We do not sell, rent, or otherwise share information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Privacy Notice or with your express prior permission.

We may share information that does not reasonably identify you or your organisation as permitted by applicable law.

11. International Transfers

Where you are submitting personal data from within the European Economic Area ("EEA"), such information may be transferred to countries outside the EEA.

By way of example, this may happen if one or more of our third party service providers with whom we share personal data in accordance with section 9 (**Disclosure of your information**) are located, or have their servers located, outside your country or the country from which the data were provided.

If we transfer your information outside the EEA in this way, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

The country has been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

If we use certain service providers based outwith the EEA, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

If we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

12. Retention of your data

We retain the information we collect no longer than is reasonably necessary to fulfil the purposes that such data was originally collected in accordance with our internal data retention policies or to comply with our legal and regulatory obligations. The table below sets out the length of time we retain your personal data:

What personal data?	How long do we keep it and why?
Data we collect through Google Analytics IP address, location, browser type, device used, operating system, pages accessed and date / time of access.	38 months to be able to track how users are using our website over time, as the website changes, in order to optimize the content we provide and marketing we do
Data Facebook collects through your use of our Facebook page	2 years to track how users are using our Facebook page over time, in order to optimize the content we provide and marketing we do
Data we collect through Facebook pixel Information about website and application browsing, activity, history, and device information	2 years to track response to our Facebook promotions, optimise the Facebook advertising we do
Data we collect when you contact us	1 year so we can respond to requests and

	follow up requests
Transaction data when you register your bank account	13 months to allow us to model to businesses the effects of making sustainability investments
Data we collect through Amplitude Information about website and application browsing, activity, history, and device information	2 years to be able to track how users are using our website over time, as the website changes, in order to optimize the content we provide and marketing we do
Data we collect through Branch Information about device, browsing, activity, history.	2 years to be able to understand how users are engaging with our product.
Data we collect through OneSignal Information about device, browsing, activity, history.	2 years to be able to understand how users are engaging with our product.

13. Security

Security of your personal information is important to us and we follow generally accepted industry standards and best practices to protect your information at all times.

We store information in access controlled premises or electronic databases requiring logins and passwords using best in class technology and practices. All employees, officers or contractors of Cogo and third party providers with access to confidential information are subject to access controls and confidentiality obligations, and we require our third-party data storage providers to comply with appropriate information security industry standards.

Whilst we continually strive to ensure that our systems and controls are updated to reflect technological changes, the transmission of information via the internet is not completely secure, and as such we cannot guarantee the security of your data transmitted to our online services which is at your own risk.

If you communicate with us using a non-secure web platform, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

Once we have received your information, we will take all reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

You can help us to keep your information secure by ensuring that any username or password in relation to our online services is kept strictly personal to you and not be made available to any other person. You should stop using your username and password and notify us immediately if

you suspect that someone else may be using your user details or password.

14. Cookies Policy

Our website and services delivered online use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and to allow us to improve our online services.

You can read about the cookies we use and how to manage them in our [Cookies Policy](#).

15. Online services – Links to third party sites, services and content

In addition to our online services, which we control directly, we also use and provide links to websites which are controlled by third parties, which may include:

- Twitter, LinkedIn, Instagram and YouTube, where we have certain Cogo accounts and profiles.
- Facebook, where we have a social page.

If you use or follow a link to any of these third-party websites, please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you.

Our online services may include integrated content or links to content provided by third parties (such as video materials). This Privacy Notice does not address the privacy, security, or other practices of the third parties that provide such content.

16. Your rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Access to your information (Data Subject Access Request)
- Request correction of your personal data
- Request deletion of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent
- Right to review by an independent authority

If you would like to exercise any of the rights set out in this section, please contact us at privacy@cogo.co. You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

Depending on the nature of the request, we may be required to verify the identity of those who make a request to us. We will accept the following forms of ID when information on your personal data is requested: Passport, Driving licence, Birth certificate, Utility bill dated within the last 3 months.

We may refuse to provide access where we have legitimate reasons for doing so under applicable data privacy laws, and in exceptional circumstances may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision.

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please note that where you withdraw your consent we will no longer be able to provide you with the products or services that rely on having your consent.

If you are not satisfied with our response to any privacy-related concern you may have, please contact the appropriate body in Section 3: Getting in Touch.

17. Changes to this privacy notice

Your provision of personal data to us or use of our online services constitutes your acceptance of the terms of this Privacy Notice.

As technologies and information governance practices develop, and data privacy laws (and surrounding guidance) evolve, we may need to revise this Privacy Notice. You should therefore review this page regularly to ensure that you are aware of any changes to its terms.

We will post any Privacy Notice changes on this page and, if the changes are significant or may materially impact upon your rights, we will provide a more prominent notice or contact you by other means (including, for certain services, email notification of Privacy Notice changes).