

Privacy Policy

This Privacy Policy was last updated on 27 March 2019

1. Purpose

- 1.1 **Policy:** *Penrith Projects Limited's (we, us, our)* privacy policy (**Privacy Policy**) applies to all users of the Platform and should be read in conjunction with the Terms of Use.
- 1.2 **Purpose:** The purpose of this Privacy Policy is to let Users, Members and Vendors of the Platform (**you** and **your**) know when we collect personal data and what we do with it. We do not use, share or transfer personal data except as set out in this Privacy Policy. When we talk about "personal data", we are referring to information that identifies you as an individual or relates to an identifiable individual.
- 1.3 **Defined terms:** Where a defined term is used in this Privacy Policy but that term is not defined in this Privacy Policy, then such term will have the meaning given to it in the Terms of Use.

2. Data collection

- 2.1 **No disclosure required:** The Platform can be viewed without the need for you to disclose any personal information to us.
- 2.2 **Subscription:** If you wish to become a Member or Vendor of the Platform then you must either complete the online registration form (to become a Member) or contact the Platform Owner (to become a Vendor) which requires that you disclose a limited amount of personal data.
- 2.3 **Types of data we collect:** We may collect, store and use the following types of data about you from the Platform:
 - (a) personal data about you, provided by you at the time of subscribing as a Member or Vendor, which includes, but is not limited to, your name, address, email address, credit-card information/payment details (in the case of a Vendor), and any other such personal information that you provide to us through your dealings with us; and
 - (b) aggregate technical information, which tracks traffic to the Platform, which includes, but is not limited to, your device identifier, server address, IP address, domain (whether you are accessing the Platform from New Zealand or elsewhere), the platform you are using, browsers used when accessing the Platform (including version), your search terms, pages accessed on the Platform, links that are clicked on, date and time of Platform visits, your operating systems, and any other such technical information relating to your use of the Platform.
- 2.4 **Sources of data collection:** We may collect and hold personal data about you from the following sources:
 - (a) you, by filling in the registration form when you subscribe as a Member or, by contacting and providing your information to the Platform Owner to

become a Vendor;

- (b) indirectly, through your use of the Platform, including by automated technologies and interactions;
- (c) through your interaction with our administrators, such as by telephone or email;
- (d) through cookies (see clause 5 below) and Google analytics (see clause 5.4 below); and
- (e) provided by third parties authorised by you.

2.5 **Services unavailable:** Failure to provide necessary personal information when requested may result in certain services on this Platform not being available to you.

2.6 **Changes:** Members are able to access, change and update their details (name, email address, password, and credit card information) on their account details page. Vendors are able to change and update their details by contacting the Platform Owner.

3. Disclosures of your data

3.1 **Disclosure:** We will not disclose personal data we hold about you to any third party except as set out in this clause 3.

3.2 **Service providers:** We work with third party service providers who provide hosting, maintenance, backup, storage, infrastructure, payment processing, analysis, marketing and other services for us, which may require them to access information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under instruction from us, including abiding by policies and procedures designed to protect your information. Some of these service providers may be located in countries other than yours or ours.

3.3 **Legal obligations:** We may share information about you with a third party if we believe that sharing is reasonably necessary to:

- (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, and our service providers may also do this;
- (b) enforce our agreements, policies and terms;
- (c) protect the Intellectual Property Rights of any person;
- (d) protect the security or integrity of the Platform and our related services;
or
- (e) protect us, you or the public from harm or illegal activities.

3.4 **Sale of our business:** In the event that we propose to sell the business or any of our assets, we may provide your personal data as part of a database to a prospective buyer solely so that they can consider the purchase of the business. Should we proceed to sell the business (or a material part of it) we may provide your personal data as part of that sale so that the purchaser can

continue to operate the business and contact you about their plans for the business.

4. Use of your data

4.1 We process and use the data we collect for the following purposes:

- (a) to hold your personal data on our system and to contact you as necessary including:
 - i. to enable you to access and use our Platform;
 - ii. to send periodic emails you have subscribed to through your nominated email address or mobile text messages;
 - iii. to respond to any queries and/or comments you have sent to us; and
 - iv. to investigate any complaints relating to the misuse of the Platform or its functionality;
- (b) to allow us to administer and manage your access to our Platform, including verifying your identity and assisting you if you forget your user ID and/or password;
- (c) to monitor, develop and improve the Platform and ensure that Content on the Platform is relevant, of interest to you and presented in the most effective manner for you;
- (d) to update and maintain our records, including details of people that have accessed our systems;
- (e) to administer any contests, promotions, surveys and other services;
- (f) we may, from time to time, anonymise data and use it in a manner in which you cannot be identified so we can understand how our Platform is used; and
- (g) for any other purpose that you authorise.

5. Cookies and tracking:

5.1 **Cookies:** We may use a "cookie" file, tracking pixels and other related technologies containing information that can identify the computer, smartphone or other web-enabled device that you are working from.

5.2 **Usage:** We may use the information generated by cookies, tracking pixels and other related technologies to:

- (a) track traffic patterns to and from the Platform including information like the pages you visit, the time you spend on each page, the date and time of your visit, and referring pages (pages you came from or go to);
- (b) ensure any advertising is being shown to the most appropriate person and limit the frequency of display for certain ad formats;
- (c) enable you to enter the Platform and use certain services as a Member or Vendor without having to log on each time and to visit Member or Vendor

only areas of the Platform; and

- (d) enable us and our partners/sponsors to serve targeted advertising to you (on our Platform and elsewhere).

5.3 **Turn-off cookies:** The browsers of most computers, smartphones and other web-enabled devices are usually set up to accept cookies. If your browser preferences allow it, you can configure your browser to accept all cookies, reject all cookies, or notify you when cookies are set. Each browser is different, so check the "Help" menu of your browser to learn about how to change your cookie preferences. You do not need to have cookies turned on to use the Platform in general, but you may need them for any customisable areas that we have now or in the future. Please remember that cookies are often used to enable and improve certain functions on our Platform. If you choose to switch certain cookies off, it may affect how the Platform works and you may not be able to access all or parts of the Platform.

5.4 **Google Analytics:** We use Google Analytics website measurement software and systems to assist in tracking traffic patterns to and from our Platform, aggregating anonymous information about visits to our Platform, and randomly and anonymously surveying users of our Platform. The system is used to collect information on our network such as the number of page views, the number of unique visitors, how long these visitors spend on the Platform when they do visit, and common entry and exit points into and from the Platform. Random anonymous surveys are also used to collect further information about you. This non-personal information is aggregated using Google Analytics and then used by us in our analysis of the Platform and. The Google Analytics data is also accessible by media organisations and research companies for the purpose of conducting industry comparisons with other websites. All our pages are coded with a small piece of Google Analytics code that is transparent to you when you read that page. The software stores a cookie in your browser (if you have enabled cookies) which contains a unique identifier to allow us to track the number of unique visitors to the Platform. This information is collected and aggregated by Google Analytics and in no way can you be identified personally and no personal information is stored about you. For details of Google Analytics' privacy policy, click [here](#).

6. Linking and third-party websites

6.1 **Linked sites:** The contents of the Platform may include links to other third-party websites (**Linked Sites**) or featured articles on Vendors (**Featured Articles**). The Linked Sites and Featured Articles are provided to you as a convenience and/or a courtesy, and the inclusion of any link does not imply our endorsement of the Linked Sites or Featured Articles or any association by us with their business or owners. We are not responsible for the data protection/privacy/cookie usage policies of any Linked Sites and those sites may not follow the same privacy policies as us. We recommend that you check any relevant privacy policies of such Linked Sites before providing your personal data to any third party.

7. Security

7.1 While we use reasonable safeguards to protect your personal information against theft, loss or unauthorised access, use, modification, disclosure or disposal, no data transmission over the Internet can be guaranteed to be completely secure. We cannot ensure or warrant the security of any information you transmit or receive through the Platform. These activities are conducted at

your own risk.

8. Opting in and Opting Out:

- 8.1 **Changes:** If our intended collection, use or disclosure of your personal data is outside the collection, use or disclosure set out in this Privacy Policy we will give you the option to:
- (a) opt out and not receive certain services or participate in certain interactive areas; or
 - (b) opt in to agree to be contacted by us in relation to certain matters such as notification of new features to the Platform and/or promotional activities.
- 8.2 **Unsubscribe:** You may opt out of receiving certain types of communications from us by utilising the unsubscribe function in communications sent to you. Any emails we send will also always contain a link at the bottom enabling you to edit your email setting or be removed from our general mailing list. If you elect not to receive emails or ask to be removed from a mailing list, we may still send you emails where it is necessary to provide you with details of any transactions you have completed via the Platform, or changes to our services or the way the membership or Platform is to operate.

9. Holding, accessing and correcting

- 9.1 **Privacy Act:** Under the New Zealand Privacy Act 1993, you have rights of access to and correction of personal information that we hold. For information about this Act and how it protects the personal information of individuals in New Zealand, click [here](#).
- 9.2 **Access:** You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you.
- 9.3 **Correction:** You have the right to request correction of any of your personal information provided to us, at any time and as often as necessary. We rely on Members and Vendors to update or correct their personal information whenever necessary. We offer the ability for Members and Vendors to correct or change their personal information at any time and as often as necessary. Members can do this by logging onto the Platform. Vendors can do this by contacting the Platform Owner. This enables you to have any incomplete or inaccurate information we hold about you corrected or updated.
- 9.4 **Contact us:** If you would like to access the personal data relating to you that we have stored, or to request correction of such personal data, or if you have any concerns regarding this Privacy Policy, please contact us by any of the means set out below.
- (a) Email: hello@thecurator.nz
 - (b) Phone: +64 212455520
- 9.5 **Cost:** You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). We may charge a reasonable fee where permitted by law if your request is clearly unfounded, repetitive or excessive.
- 9.6 **Verifying identity:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal

data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.7 **Privacy Commissioner:** If you are not satisfied with our response to any privacy-related concern you may have, you can contact the Privacy Commissioner:

(a) Office of the Privacy Commissioner
PO Box 10-094
Wellington 6143, New Zealand
Phone: +64 4 474 7590

(b) Enquiries Line: 0800 803 909

(c) Email: enquiries@privacy.org.nz

10. Changes to Privacy Policy

10.1 We reserve the right to change this Privacy Policy (**Amendments**) at any time. Any Amendments will be posted on this page on the Platform (and the "last updated" date will be updated). By continuing to access the Platform, you agree to be bound by the Amendments. We recommend you regularly review this Privacy Policy to see any updates or changes to our Privacy Policy.