

## SPECULO LIMITED – PRIVACY POLICY

Speculo Limited (NZCN 6722494) (**we, us or our**), understands that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, when interacting with you.

### The information we collect

**Personal information:** is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including your name, age and gender.
- **Contact Data** including your telephone number, address and email.
- **Financial Data** including bank account and payment card details.
- **Background Verification Data** including your government-issued identification details if requested as part of our onboarding process to comply with our due diligence obligations, anti-money laundering laws and related ongoing monitoring commitments.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies or analytics), and communications with our website.
- **Profile Data** including your username and password for our platform, purchases or orders you have made with us, content you post, send receive and share through our platform, information you have shared with our social media platforms, and support requests you have made.
- **Interaction Data** including information you provide to us when you participate in any interactive features, including surveys, contests, promotions, activities or events. As part of Interaction Data we may record conversations for the use of being transcribed into written messages, for our own internal use.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.

### How we collect personal information

We collect personal information in a variety of ways, including:

- when you interact directly with us, including face-to-face, over the phone, over email, or online;
- when you complete a form, such as registering for any events or newsletters, or responding to surveys;
- when you apply for a job with us;
- from third parties, such as details of your use of any website we operate (from our analytics and cookie providers and marketing providers. See the "Cookies" section below for more detail on the use of cookies); or
- from publicly available sources, such as social media or the New Zealand Companies Office.

### Why we collect, hold, use and disclose personal information

**Personal information:** We collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our software, including to provide you with a login;
- to assess whether to take you on as a new client, including to perform anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks on you;
- to do business with you, including to dispatch and deliver our products to you;
- to contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us;

- to contact and communicate with you about any enquiries you make with us via any website or platform we operate;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics (including profiling on our website), market research and business development, including to operate and improve our business, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you;
- to run promotions, competitions and/or offer additional benefits to you;
- if you have applied for employment with us, to consider your employment application; and
- to comply with our legal obligations or if otherwise required or authorised by law.

## Our disclosures of personal information to third parties

### Overseas disclosure

#### Personal Information

We may store personal information overseas, including in, Australia. Where we disclose your personal information to the third parties listed above, these third parties may also store, transfer or access personal information outside of New Zealand, including but not limited to, Australia. We will only disclose your personal information overseas in accordance with the New Zealand Privacy Principles.

### Your rights and controlling your personal information

**Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to do business with you.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

**Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

**Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

**Complaints:** If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you may contact the Office of the New Zealand Privacy Commissioner.

### Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

## Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

## Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## Use of location services data

We collect your precise or approximate location via our platform for the following purposes:

- for security and safety;
- to prevent and detect fraud; and
- as permitted by law.

We collect this information when you use do business with us. If you do not want us to use your location for the purposes above, you should turn off the location services. If you do not provide geolocation data to us, it may affect our ability to do business with you.

## Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

**For any questions or notices, please contact us at:**

Speculo Limited (NZCN 6722494)

Email: [privacy@speculo.co.nz](mailto:privacy@speculo.co.nz)

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