

# DEVOLI PRIVACY POLICY

## INTRODUCTION

Devoli Limited (company number 2111671), (we, us, our) complies with the New Zealand Privacy Act 2020 (the Act) and the Telecommunications Information Privacy Code 2020 (the Code) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

This policy sets out how we will collect, use, disclose and protect your personal information.

This policy does not limit or exclude any of your rights under the Act or the Code. If you wish to seek further information on the Act or the Code, see [www.privacy.org.nz](http://www.privacy.org.nz).

## CHANGES TO THIS POLICY

We may change this policy by uploading a revised policy onto the website. The change will apply from the date that we upload the revised policy.

**This policy was last updated in June 2022.**

## WHAT DO WE COLLECT

If you are our customer, we collect account and billing information such as your name, email address, phone number, demographic information, date of birth, address, location, product and service choices, payment details and billing information.

When you contact us on behalf of a customer, or if a customer has nominated you as its representative, we collect your name, email address, phone number and job title.

If a customer nominates you to receive our services under the customer's account, we collect your name, email address, phone number, job title and any other information we require or ask for to provide you with those services.

When you use any of our services, website or online platforms, personal information we collect may include your IP address, service usage information, call and/or text and location data, information about your device and technical and performance information about our services.

When you set up a user account for any of our online platforms, we collect your name, email address, user name, password, phone number and any other information we require or ask for to set you up with a user account.

When you fill in a contact or enquiry form on our website, call us, meet us in person or otherwise contact us, we collect your name, email address, phone number and any other information you choose to provide to us.

When you sign up to our newsletter and other electronic alerts, we collect your name, email address, phone number, user preferences and any other information you provide to us when you ask to receive our newsletter or other alerts.

When you respond to our feedback surveys, we collect your company name and any other information you choose to include in your response.

When you refer another person to use our services, we collect your name and email address and the other person's name and email address and any other information you choose to include in the referral.

If you use a credit card to pay for our services, we use a third party service provider (currently, Stripe) to process credit card transactions. We do not have access to your credit card information. You can see further information about how Stripe processes your credit card information in their privacy policy at <https://stripe.com/en-nz/privacy>.

## WHO DO WE COLLECT YOUR PERSONAL INFORMATION FROM

We collect personal information about you:

- ▲ from you, when you provide that personal information to us, including via our website and online platforms, through any account sign-up process, or through any contact with us (e.g. telephone call or email)
- ▲ when someone else within your organisation provides it to us (e.g. if they nominate you as a representative for the customer or as a recipient of services under the customer's account, or they provide us with your details for credit checking purposes)
- ▲ automatically when you use any of our services (including those provided by 3rd parties), visit our website or login to any of our online platforms, including service usage information, call and/or text and location data, and information about your device and online behaviour
- ▲ from third parties where the information is publicly available (e.g. through LinkedIn profiles or public directories) or you have authorised this. This may include accessing certain personal information from third party authentication services (e.g. Auth0) if you login to your account with us using these services or otherwise provide us access to information from these sources. The third party provider that we use will be displayed and you can visit its privacy policy for further details on how it deals with personal information.

Where possible, we will collect personal information from you directly.

We may combine the personal information about you that we receive from third parties with the personal information we collect from you directly or with device and usage data we collect automatically when you use our services, visit our website or login to any of our online platforms.

## HOW WE USE YOUR PERSONAL INFORMATION

We will use your personal information:

- ▲ to fulfil your requests for information

- ▲ to provide our services, website and online platforms, including to customise your user experience on our website and online platforms
- ▲ to monitor, maintain and improve our services, website and online platforms
- ▲ to monitor, maintain and protect the security and integrity of our services, website and online platforms, including identifying potential threats, such as hacking and virus dissemination and other security vulnerabilities
- ▲ if you are our customer, or you use our services under another person's account:
  - to market our, our related entities' or our business partners' services to you, including to contact you electronically (e.g. by text or email) for this purpose
  - to contact you for market research
  - to better understand your needs and provide you with better services
- ▲ if you are our customer, or a director or nominated representative of a customer:
  - to undertake credit checks and/or verify your identity
  - to bill you (or the customer) and collect money that you or the customer owes us, including authorising and processing credit card transactions
- ▲ to respond and deal with communications from you, including complaints
- ▲ to carry out any activity in connection with a legal, governmental or regulatory requirement on us, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution
- ▲ to carry out activities connected with the running of our business, e.g. internal reporting, personnel training, quality control, network monitoring, testing and maintenance of computer and other systems
- ▲ to conduct research and statistical analysis (on an anonymised basis)
- ▲ in connection with the transfer of any part of our business
- ▲ for any other purpose authorised by you or applicable law.

You can unsubscribe from any marketing communications from us by following the instructions on any communications sent to you. You can also exercise this right at any time by contacting us using the details at the end of this privacy policy.

As part of the process of connecting and delivering your communications, we may need to collect the content (e.g. calls, emails, texts, data) and destination of your communications. We only use this information to deliver it to your intended recipient as part of the service we provide, to detect and prevent attacks against our networks, systems and platforms, and to comply with our legal obligations (including where instructed to do so by a law enforcement agency).

## DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to:

- ▲ any business that supports our services, website and online platforms, or that provides or maintains any network, IT system or data centres that we use to provide our services, website and online platforms, including the service providers that operate the fibre, copper or cellular networks over which our services are delivered or that provide other services that we onsell to you or to the customer under whose account you use those services (Service Providers)
- ▲ if you are our customer, or you use our services under another person's account:
  - a directory assistance service provider to list your telephone number, name, and address, only where you have consented to such disclosure
  - our related entities or our business partners for the purpose of marketing their services
- ▲ if you are our customer, or a director or nominated representative of a customer:
  - a credit reference agency for the purpose of credit checking you, only where you have consented to such disclosure
  - a debt collection agency for the purpose of collecting money that you or the customer owes us
- ▲ if you use our services under another person's account, the person who administers or pays for that account
- ▲ other third parties (for anonymised statistical information)
- ▲ a person who can require us to supply your personal information (e.g. a regulatory authority)
- ▲ any other person authorised by the Act or another law (e.g. a law enforcement agency)
- ▲ professional advisors (e.g. accountants, lawyers, auditors)
- ▲ any other company in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition
- ▲ any other person authorised by you.

## OUR SERVICE PROVIDERS

Our Service Providers may collect and hold personal information about you in accordance with the Act and Code. Such information may be obtained from you or generated within our or our Service Providers' networks when you or anyone else uses our or their services.

Our Service Providers may use the personal information they collect about you for the purposes of:

- ▲ providing and improving the services they provide to us

- ▲ dealing with requests, enquiries or complaints and other customer care related activities
- ▲ carrying out any activity in connection with a legal, governmental or regulatory requirement on the Service Provider, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution
- ▲ carrying out activities connected with the running of the Service Provider's business, e.g. internal reporting, personnel training, quality control, network monitoring, testing and maintenance of computer and other systems
- ▲ in connection with the transfer of any part of the Service Provider's business
- ▲ identifying potential threats, such as hacking and virus dissemination and other security vulnerabilities.

Our Service Providers may share the personal information they collect about you with:

- ▲ their personnel, suppliers and service providers, for the purposes set out above
- ▲ persons to whom our Service Providers may be required to pass that personal information by reason of legal, governmental or regulatory authority including law enforcement agencies and emergency services
- ▲ any person or organisation as authorised by the Act and/or Code, including with your prior authorisation, or as authorised by any other applicable law.

## PROTECTING YOUR PERSONAL INFORMATION

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

You can play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used in relation to our products and services. Please notify us immediately if there is any unauthorised use of your account or any other breach of security.

## ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

Subject to certain grounds for refusal set out in the Act and the Code, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email us at [privacy@devoli.com](mailto:privacy@devoli.com). Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

## INTERNET USE

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

We use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognise your browser) to monitor your use of our website and online platforms. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of our website and online platforms.

We use Google Analytics. For details on how Google Analytics collects and processes data, please see "How Google uses data when you use our partners' sites or apps", located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

## CONTACT US

If you have any questions about this privacy policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us at [privacy@devoli.com](mailto:privacy@devoli.com).