

Privacy Policy

Robin Davies Limited

1. Introduction

- 1.1 Robin Davies Limited trading as Robin Davies (we, us, our) respects your right to privacy and understands that protecting your personal information is important. We comply with the New Zealand Privacy Act 2020 (the Act) when dealing with personal information.
- 1.2 This Privacy Policy (Policy) sets out how we will collect, use, disclose and protect your personal information. Please read this Policy carefully to understand our practices regarding your personal information.
- 1.3 You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our services to you and your use of our services.

2. Changes to this policy

- 2.1 We may change this Policy by uploading a revised Policy onto www.robindavies.co.nz (the/our Website). The change will apply from the date that we upload the revised Policy.
- 2.2 This Policy was last updated on 1 March 2025.

3. Personal information

- 3.1 Personal information is information about an identifiable individual (a natural person). The types of information we may collect about you and your staff include:
 - a. names;
 - b. contact details including email addresses, mailing addresses, street addresses and/or telephone numbers;
 - c. preferences and/or opinions;
 - d. details of services we have provided to you and/or that you have enquired about, and our response to you;
 - e. event attendance information, including any dietary requirements and medical information;
 - f. your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
 - g. information about your access and use of our services, including through the use of internet cookies, your communications with our online services, the type of browser you are using, the type of operating system you are using and the domain name of your internet service provider;
 - h. additional personal information that you provide to us, directly or indirectly, through your use of our services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
 - i. any other personal information requested by us and/or provided by you or a third party.

4 Who we collect your personal information from

- 4.1 We collect personal information about you from:
- a. you, when you provide that personal information to us, including via our Website and through any contact with us (e.g., telephone call or email), or when you buy or use our services; and
 - b. third parties where you have authorised this or the information is publicly available.
- 4.2 We will only keep your personal information for so long as it is necessary for the purposes for which your personal information may lawfully be used.
- 4.3 We are committed to protecting the privacy of children or young persons who use our services and/or our Website. We do not knowingly collect data and information relating to children and young persons directly from them. By using our Website, you confirm that any information of children or young persons provided by you has been obtained in compliance with the Act. We will not require children or young persons to provide more information than is reasonably necessary in order to perform our services.

5 How we use your personal information

- 5.1 We will use your personal information:
- a. to provide services to you;
 - b. to assess your creditworthiness, to bill you and to collect money that you owe us;
 - c. to respond to communications from you;
 - d. to market our services to you;
 - e. to improve the services that we provide to you;
 - f. to conduct research and statistical analysis (on an anonymised basis);
 - g. to protect and/or enforce our legal rights and interests;
 - h. to detect, mitigate, and report fraud or prohibited activity;
 - i. to comply with the law, law enforcement agencies and any Court order; and
 - j. for any other purpose authorised by you or the Act.
- 5.2 We will only use your personal information for the purposes for which it was obtained.

6 Disclosing your personal information

- 6.1 We may share or disclose your personal information to:
- a. any business that supports our services where disclosure is reasonably required to fulfil any purpose for which your personal information was collected;
 - b. persons as may be necessary or desirable to enable us to exercise any power to enforce or attempt to enforce any of our rights, remedies, and powers under the Terms and Conditions and Robin Davies Limited;
 - c. courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law; and
 - d. any other person authorised by you or where consent may be reasonably inferred from the circumstances or where we are permitted to under the Act.
- 6.2 A business that supports our services may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand. We take steps to reasonably ensure those businesses have similar levels of data protection as required by the Act.

6.3 We use third party providers to store our data, including personal information and we take reasonable steps to ensure that our third party data processors can meet our privacy and security requirements. All the information we hold about you will be processed and stored in accordance with data protection laws which should at minimum be similar to the Act.

7 Protecting your personal information

7.1 We will take reasonable steps to keep your personal information safe from loss, unauthorised activity or other misuse. As with all internet and technology dealings, we are unable to guarantee its absolute security. If you suspect your personal information may no longer be secure or has been compromised, please let us know immediately.

7.2 We utilise the services of third party IT, cloud storage, system, accounting tools and management systems, and email providers which may change from time to time. If you would like to know who we use and where your information is stored, please get in touch with our privacy officer and we will reasonably endeavour to provide that information to you.

7.3 Any credit card details used to make a payment are securely transmitted to our bank where the transaction will either be accepted or declined. We only store a payment authorisation reference number associated with your transaction for the purposes of keeping track of payments to us but we do not store your credit card details.

8 Accessing and correcting your personal information

8.1 Subject to certain grounds for refusal set out in the Act, 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.

8.2 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.

8.3 Our privacy officer is responsible for overseeing your personal data requests. If you want to exercise either of the above rights, email our privacy officer Robin Davies at robin@robindavies.co.nz. 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).

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

8.5 If you are not satisfied with our response, or believe we are processing your information unfairly, unlawfully or without transparency, you have the right to contact the Office of the Privacy Commissioner. You can find more information at <http://privacy.org.nz>.

9 Your representation

9.1 When you use our Website, purchase or use our services, you represent that the personal information of any third parties you provide to us, and its manner of collection, are compliant with the Act and that you have obtained the relevant consent from the said third parties.

10 Internet use

- 10.1 We cannot guarantee the privacy of personal information that you transmit over the internet or that may be collectable in transit by others (including contractors who provide services to us).
- 10.2 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 cannot accept any responsibility or liability for the privacy practices of third-party websites and your use of those websites is at your own risk.

11 Cookies

- 11.1 We may use cookies on our Website from time to time to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.
- 11.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer so that we can recognise your browser and store your preferences.
- 11.3 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 online services.
- 11.4 The Website may use from time to time the services of Google Analytics, Google Tag Manager and Google ID as well as WordPress PHP sessions and WP settings. These would be used for the above purposes as well as to inform, optimise, and serve ads on the internet based on a user's past visits to the Website. Personally identifiable information is not stored by us or any third-parties. You can visit the Google and WordPress websites to find more information on their privacy practices and how to opt out in relation to specific cookies.

12 Governing law and jurisdiction

- 12.1 Nothing in this Policy shall limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see www.privacy.org.nz.
- 12.2 This Policy shall be governed by the laws of New Zealand. You agree to submit to the exclusive jurisdiction of the New Zealand courts.

13 Contacting us

- 13.1 If you have any questions about this Policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us at robin@robindavies.co.nz.