

Privacy Policy

Zoono Group Limited

ACN 006 645 754

Approved and effective: July 2019

Privacy Policy

1. Scope

This Privacy Policy explains how we handle and protect your personal information. It also explains how you may request to access and correct your personal information, how to make a privacy complaint and how we will handle complaints. We recommend that you review this policy regularly as we may amend it from time to time to meet our legal obligations, reflect our current practices and ensure we are transparent about our information management.

Zoono, its businesses, websites and apps operate from Australia and this policy provides information in accordance with our obligations under the Privacy Act.

In this policy, Zoono (we, us) means Zoono Group Limited, its businesses, related bodies corporate (including but not limited to ##[List all Group entities]).

Any Zoono entity overseas which you may deal with will also be subject to local laws which may require compliance with privacy laws in the country in which they operate and you should direct any further questions you have about applicable local laws to the relevant entity.

By providing personal information to Zoono, either directly or allowing another person to do so on your behalf, you acknowledge that this Policy will apply to how we handle your personal information.

If you do not wish your personal information to be handled in accordance with this Policy, we recommend that you do not provide your personal information to us. If you do not provide us with all the personal information we request, or if you do not provide any consent we require to be authorised to collect and handle certain personal information, this may affect our ability to provide services to you or respond to your inquiry, request or complaint.

2. What Personal Information do we collect and how?

The personal information we usually collect about you includes your name, mailing address, telephone number, email address, credit and debit card details, details of your order, other personal details and any special needs you may have.

We may from time to time monitor and review any information transmitted or received through our website, or through telephone or e-mail communications. During monitoring, the information may be examined, recorded or copied. We will tell you when you telephone us if we will record the call.

When you access our website, use any of our mobile applications or open an electronic communication from Zoono, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer, and which are generally assigned when you access the internet. Alone, IP addresses are not personal information, but we may link IP addresses to other personal information we hold about you and use it for the purpose of fraud prevention and protection.

In some circumstances Zoono may need to collect personal information that is sensitive information. Zoono will normally only collect your sensitive information with your consent and where it is required for the provision of products and/or services to you or in the event of other special circumstances.

We collect your personal information directly from you in the course of providing a product, service or advice or when you otherwise deal with us. For example, your personal information will be collected when you deal with us over the telephone, send us a letter or an email, visit our websites or use our mobile applications, complete an online registration form, provide information to complete an order or subscribe to a service provided by us or register as a member, or participate in one of our surveys, competitions or promotions.

We may also collect your personal information from others who make a booking on your behalf and they should be authorised to provide us with your information.

Our Cookies Policy explains what information we collect through our use of cookies, analytics and other technologies and for what purposes.

3 For what purposes do we collect your personal information?

We collect your personal information for the following purposes in relation to providing you with our products, services and advice and to assist you with the use of our products and services:

- a. provide you with products, services and advice;
- b. consider any request by you for a product or service;
- c. provide you with information about other products and services that may be of interest to you (including information about our business partners' products and services). Please see the section titled 'MARKETING AND PRIVACY' for further information about receiving direct marketing;
- d. assist in arrangements with other suppliers in relation to the provision or use of a product or service;
- e. collect and process payments, through us or a third party;
- f. perform all other administrative and operational tasks (including risk management, systems development and testing, staff training, and market or customer satisfaction research);
- g. facilitate your participation in loyalty programs;
- h. for quality assurance and other purposes and so that we can censor, edit, remove or prohibit the transmission or receipt of any information communicated through our systems that we deem inappropriate or in violation of our terms and conditions;
- i. enable you to, participate in a survey, competition or promotion,
- j. process a transaction through our websites, over the phone, through a mobile application or a franchised agent;
- k. analyse how our products and services (including any websites) are used and understand the effectiveness of our communications;
- l. personalise any product, service or communication we provide to you, tailor your experience on our website or other websites to your interests and make more appropriate product and/or service recommendations;
- m. investigate, detect and protect us and other third parties against negligence, breach of contract, fraud, theft and other illegal activities; and
- n. respond to and manage inquiries, complaints, feedback and claims.

4 When do we disclose your personal information?

We may disclose your personal information for the above purposes to:

- a. suppliers of products or services which you require or request;
- b. third party service providers who assist in fulfilling an order you have made;
- c. a person undertaking or completing an order on your behalf;
- d. third party sponsors or co-sponsors of promotions on our website. Only information collected during a promotion will be disclosed to these parties;
- e. your employer, where you are an employee of one of our corporate, business or government clients and you are participating in an event or travelling for work purposes;
- f. other Zoono entities;

- g. government and/or regulatory authorities and our insurers in the event of an accident, disaster or emergency; and
- h. Zoono's contractors, suppliers and service providers, including:
 - i. suppliers of goods or services that assist us in providing our products and services to you, such as any external contract manufacturers we use;
 - ii. publishers, printers and distributors of marketing material;
 - iii. event and expo organisers;
 - iv. marketing, market research, research and analysis and communications agencies;
 - v. mailing houses, freight services, courier services; and
 - vi. external business advisers (such as lawyers, accountants, auditors and recruitment consultants); and
- i. others where we are authorised or required by law or have your consent to do so.

Given the nature of our products and services some of the third parties we may disclose your personal information to, to facilitate your order and/or to enable the performance of administrative and technical services by them on our behalf, will be located overseas. These are our suppliers, manufacturers, service providers, website manager, cloud infrastructure and data centre providers who are located overseas, including in Australia, India, Europe and the United States of America.

Your personal information may also be shared between Zoono entities some of which are located overseas, including in the United States of America and United Kingdom. Generally, we will only disclose your personal information to these overseas entities in connection with facilitation of the provision of our products and services to you and/or to enable the performance of administrative and technical services by them on our behalf.

In the event that we or a part of our business undergo re-organisation or are sold or licensed to a third party, any personal information we hold about you may be transferred to that re-organised entity, licensee or third party.

5 Zoono Websites, Apps and Systems

Zoono operates a number of websites. Our Cookies Policy explains information we collect about users of these websites.

6 Storage and Security of Personal Information

We store personal information in a combination of secure computer storage facilities, paper-based facilities and other records.

We take reasonable steps to maintain the security of the information we store in our systems or in physical records. We use a combination of security measures to prevent the unauthorised access of our servers and regularly review our security policies. Your personal information will be stored in secured locations and on servers controlled by Zoono, located either at our offices or at the offices of our service providers.

7 Accessing and Updating your Personal Information

You may ask Zoono for access to any personal information we hold about you, subject to some exceptions in the Privacy Act. You can also ask us to correct personal information Zoono holds about you. You can contact our Privacy Officer using the details in the section titled 'CONTACT OUR PRIVACY OFFICER' below to request access to or correction of the personal information we hold about you.

We will need to verify your identity before responding to your request. We may charge a reasonable fee for providing access to your personal information. However, we will not charge for the making of the request. If we refuse access to all or some of the personal information you request or to correct your information, we will write to you and explain why and how you can complain.

8 Direct Marketing and your Privacy

Serving customers well is very important to us. As part of this service, we may use your personal information to identify a product or service that you may be interested in. We may with your consent where required by applicable law, use the contact details you have provided to contact you from time to time whether by phone, email, SMS or post to tell you about new or exciting products or services and special offers that we believe may be of interest to you, including information about our business partners' products and services.

You can opt-out of receiving direct marketing communications from us, including communications from us on behalf of our business partners at any time by contacting our Privacy Officer using the details in the section titled 'CONTACT OUR PRIVACY OFFICER' below, or by using the unsubscribe facility in the electronic communication you receive.

You can also opt-out of this kind of advertising by clicking [here](#). By opting out of this kind of advertising you may still receive ads from Zoono or ads from other parties that are broadly targeted.

9 Privacy Complaints

If you wish to complain about our handling of your personal information, please contact our Privacy Officer using the details below.

We will investigate all complaints and respond to you as soon as practicable. We will need to verify your identity. If we find a complaint justified, we will resolve it. If necessary, we will change our policies and procedures to maintain our high standards of performance, service and customer care.

If your complaint is not satisfactorily resolved, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). For more information on privacy, you can contact the OAIC's hotline service on 1300 363 992 or visit the OAIC's website at www.oaic.gov.au.

10 Contact our Privacy Officer

If you have a privacy complaint or wish to correct, update or access the personal information that we hold about you, please contact our Privacy Officer using the following details:

Email: privacyofficer@zoono.com

Phone: 02 8042 8481

Address: Privacy Officer
Zoono Group Limited
31 Hannigan Drive
St Johns, Auckland 1072
New Zealand

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