



PRIVACY POLICY

Protecting your privacy and keeping your personal information confidential is important to us. We are bound by the New Zealand Privacy Act 1993 in the way that we handle your personal information.

This Omni Risk Ltd policy outlines how we maintain your privacy when handling your personal information if you are a client, a visitor to one of our websites or a member of the public, in New Zealand.

In this Policy, we use the terms, "**we**", "**us**", "**our**" or "**Omni**" to refer to Omni Risk Limited of 9 Orbit Drive, Rosedale, Auckland 0632, New Zealand, and its related companies.

1. What is personal information?

Personal information means information or an opinion that identifies you as an individual.

2. The kinds of personal information we may collect from you

- 2.1 We only collect information from you that is necessary for our business with you.
- 2.2 The personal information that we collect about you may include your name, postal and street address, email address, telephone number, gender, age, profession/role, place of work, information relating to the complaints you've made to us and various personal preferences. We also collect your payment information, such as your credit card or direct debit information and company and/or industry identification data, when you purchase a product or service us.

3. How we collect personal information

- 3.1 We may collect personal information through:
 - (a) making an order;
 - (b) registering a product;
 - (c) registering for a product trial;
 - (d) new client forms;
 - (e) assessment activation;
 - (f) actions performed by you from within your product or application;
 - (g) transactional services and payment services;
 - (h) client support;
 - (i) inbound and outbound sales calls;

- (j) our website;
- (k) our distributors, licensees, resellers and authorised agents;
- (l) competition entry forms;
- (m) bookings for training and events;
- (n) customer surveys;
- (o) when you register for newsletters;
- (p) job, distributor, license, reseller or authorised agent applications;
- (q) third parties that may provide us with referrals or marketing leads;
- (r) publicly available sources such as social media websites; and
- (s) when you provide material to us to enable us to provide our services to you.

4. How we use your personal information

4.1 We use your personal information to:

- (a) fulfil orders and provide you with the products and services you've asked for;
- (b) assist your authorised professional adviser (e.g. your accountant or solicitor);
- (c) perform product registration and company file activation, identify you as the product owner and to provide client support and service to you, your business partners and your employees;
- (d) perform transactional services and payment services;
- (e) keep you informed about our products and services and those of our relevant business and joint initiative partners;
- (f) record your marketing and communication preferences;
- (g) enable secure access to our websites;
- (h) participate in any third-party acquisition or potential acquisition of an interest in us or our assets;
- (i) fulfil any legal and regulatory obligations; and
- (j) process a job, distributor, license, reseller or authorised agent application that you've submitted.

4.2 Product promotion and direct marketing

- (a) We may use your personal information to contact you about product upgrades and releases and to let you know about new services and special offers relevant to your business.
- (b) If you don't want us to use your personal information for direct marketing, you can let us know at any time through one of the following channels:
 - (i) Click the "unsubscribe" link in any of our marketing communications;
 - (ii) Contact the Omni Privacy Officer at info@omnirisk.me.

4.3 Order fulfilment

- (i) You need to provide us with your contact and payment details when you order our products and services.
- (ii) We use this information to fulfil your order and bill you. If we have trouble processing an order, we use the contact information you give us to contact you so that we can resolve the problem.

4.4 Aggregated data

Aggregated data is data that is effectively anonymous - it doesn't contain any information specific to you or your business. We sometimes share aggregated data, such as statistical trends in a particular industry sector, with our business partners.

4.5 Disclosure to third parties

- (a) We may provide your personal information to our related companies and to third party service providers that we outsource functions to. These service providers may help us with client contact, archiving, auditing, accounting, legal, business consulting, banking, delivery, data processing, automated communications, website or technology services. Our third-party providers are not allowed to use your personal information for any purpose other than helping us provide you with the service that you've asked for.
- (b) We also disclose your personal information if we are required by law or permitted by the Privacy Act to do so.

5. **Accessing our websites and how we use de-identified information**

5.1 Our websites contain many useful services, and we are constantly making changes and improvements to provide you with an even better website experience and to help make your business life easier.

5.2 Our websites may contain links to third party websites, which don't belong to us and are beyond our control. Please note we are not responsible for and cannot guarantee the privacy of these third-party websites.

5.3 We use Internet Protocol (IP) addresses to analyse trends, administer our websites, track your navigation among Omni web pages and gather broad information for aggregate use. Our web servers may also send a small data file known as a "cookie" to your internet browser or hard drive. We use cookies to track your onsite behaviour to ensure transaction pages, such as "shopping cart" interactions and support pages, work correctly. We also use cookies to personalise and improve your experience with us. Most cookies don't collect personal information and only contain coded information that cannot be used by third parties to access your confidential information. Most web browsers allow you to adjust settings to erase cookies, disallow cookies, or receive a warning before a cookie is set. Please note that some parts of our websites may not function fully if you disallow cookies.

5.4 In some cases, we or third parties may use cookies and other technologies such as web beacons and JavaScript on our websites in connection with online services like banner advertising, website analytics and surveys. These technologies enable information to be collected about your use of our websites (including your computer's IP address), which may be stored in New Zealand, the United States, Australia or other countries. The information collected by these technologies give us and third party collectors the ability to deliver customised advertising content, measure advertising effectiveness, evaluate the use of our websites and other websites and provide other services relating to website activity and internet usage. We and third parties may also transfer collected information to others if required by law, or where those other parties

process the information on our behalf. The services we may use from time to time include Google Analytics, Google AdSense, DoubleClick, Yahoo, Adobe, Bing, Kenshoo and Microsoft.

6. Holding your information and keeping it safe

6.1 We hold the personal information that we collect either in electronic databases or as hard copy documents. Personal information may be held on servers in New Zealand or elsewhere. If you are not in New Zealand, you consent to our transfer and storage of your personal information outside of the country in which you reside and, where applicable, outside of the European Economic Area.

6.2 We have a range of security measures in place to protect the personal information that we hold. For example, our web pages that request sensitive information may employ encryption technologies such as Secure Sockets Layer (SSL).

6.3 You can confirm that a data-entry page uses encryption by checking that:

- (a) the page address in the web browser's tool bar or status bar begins with https://; or
- (b) the padlock icon in the web browser's tool bar or status bar is locked.

6.4 If you are considering sending us any personal information by standard email, please be aware that the information may be less secure in transit. We are required by law to take steps to protect the security of personal information once it comes into our possession.

6.5 If you are a registered user of any of our websites, you can control access to your account with a username and password of your choice. You should choose a strong password and keep it protected from others to prevent unauthorised access.

6.6 We are also committed to protecting your information offline. All of your personal and business information, not just personal information, is subject to access controls.

7. Your right to access personal information

7.1 Subject to any exceptions in the Privacy Act, if you've provided us with personal information, you have a right to request to access or correct it. You can contact us with your request by using the contact details at the bottom of this Policy.

7.2 We will respond to you as soon as we are reasonably able to. To help us respond to you, include as much detail as possible about the information that you want to access or correct and, if applicable, how you'd like to access the information.

7.3 We will provide you with a copy of or details of your personal information wherever possible.

7.4 In some circumstances we might not be able to give you access to the personal information that you have requested, or we may refuse to correct your personal information. If this

occurs, we will let you know the reasons for our decision in writing. If we decline to correct your personal information, you may request that we take such steps (if any) as are reasonable in the circumstances to attach to the information a statement provided by you so that it will be read together with the personal information. If we don't allow you to access or correct your personal information, and you don't agree with our decision, you can make a complaint by following the process outlined in section 8.

8. Any questions or complaints

- 8.1 If you want to make a complaint about a breach of your privacy by us, you can contact us using the contact details at the bottom of this Policy. We will try to resolve your complaint as quickly as possible, and in any event within 30 days of hearing from you. We will keep you informed if your complaint takes longer to resolve. We will let you know the outcome of your investigation, including how we intend to resolve your complaint and what, if any, corrective actions we have taken.
- 8.2 For further information about our privacy complaints process you can contact the Omni Privacy Officer at info@omnirisk.me
- 8.3 If you are not satisfied with the manner in which we handle your complaint or our decision in respect of a complaint you may contact the Privacy Commissioner (www.privacy.org.nz)

9. Changes to our Privacy Policy

- 9.1 We make changes to this Policy from time to time. Please check our website regularly for any updates to this Policy. You can also get a copy of the most current version of this Policy by either emailing the Privacy Officer using the contact details in Section 8.2 above.
- 9.2 Continuing to use our website and otherwise deal with is deemed acceptance this Policy as it applies from time to time.

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