

Privacy (including Credit Reporting) Policy

Our Privacy Commitment

We are committed to protecting the privacy of your personal information.

We comply with New Zealand Privacy Laws

Pivotel is bound by and complies with the telecommunications privacy rules set out in the Telecommunications Information Privacy Code 2003, the Privacy Act 1993, and the Telecommunications Act 2001.

What information do we collect?

We may collect the following types of personal information to enable the sale and subsequent activation of satellite equipment. The collection of this personal information allows us to provide a responsive and informed customer care service, to issue you with accurate and personalised bills, and enables us to enhance and tailor our products and services to meet your needs.

- Your name, date of birth, gender and contact details (which may include home address, billing address, email address and phone numbers)
- Payment information such as bank account and credit card details where relevant
- Information to prove your identity. This could be your driver's license, passport or other approved forms of ID
- Information relating to your credit worthiness
- Information about your products and services including your hardware model, serial numbers, unique device and service identifiers
- Information about how you use your products and services such as your network usage including time and duration of your calls, volume of data sent or received, called numbers, and expenditure.
- Details about your account. This includes your password and username
- Personal preferences
- Contact history regarding your account.
- Information you provide to us through surveys
- Vessel identification information, including MMSI, IMO and Call Sign

You might also need to provide personal information about other individuals to us (e.g. about your authorised representative). If so, we rely on you to have informed those individuals that you are giving their personal information to us, and to have advised them about this policy.

How we collect your information

There are three ways that we can collect your information.

1. **You give it to us** when you or your representative interacts with either us or one of our trusted partners. This might happen when you are setting up an account with us, using one of our products or services, or taking part in a competition, prize draw or survey.
2. **We collect information** when you use our networks, products and services including our call centres and online services. For example, we may use network tools to collect your call records.

3. **We obtain information from outside sources** like credit reports, marketing mailing lists, and public information, including public posts to social networking sites. This can also include information gained from our partners if you have interacted with them. These partners include our dealer network, credit reporting bodies, and identity and fraud checking services.

We understand that you might not want to give us particular personal information. This may mean we are not able to provide you with the products or services you need.

How we hold and protect your personal information

We may store your information in hard copy or electronic format, and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure.

We use account IDs and passwords to prevent unauthorised access to your account. You should update your password regularly and only share these details with people you authorise to access and manage your account. You can get help on how to use these tools by contacting us using the contact details below.

Access to your personal information

We take all reasonable measures to make sure the personal information we hold is accurate, complete and up to date. However, the accuracy of your information is largely dependent on what you provide us. To make sure we've got your most current and accurate details, please let us know when your information changes. For example, if you change your name, email address or move house.

You can request us to provide you with access to your personal information by contacting us using the contact details below. Upon your request, we will take reasonable steps to provide you with access to your personal information unless there is some legal, law enforcement, public health and safety or specified business issue involved.

There is generally no cost for accessing the personal information we hold about you, unless the request is complex or resource intensive. If there is a charge, it will be reasonable, and we will let you know what it is going to be so that you can agree to it before we go ahead.

How do we use your information?

We may use your personal information for a number of purposes connected with our business, including:

- Processing your order for our products and services
- Conducting credit checks and credit scoring activities
- Providing you with the products and services you have ordered from us
- Communicating with you on mediums such as emails, SMS and social media
- Preparing and issuing your bills, and collecting the money you have spent on our products and services
- Updating and administering your account details

- Dealing with your requests, enquiries or complaints and any other customer care related activities
- Marketing our products, and carrying out market, product and service analysis activities generally
- Registering your details and fulfilling any requests or requirements you may have in relation to competitions, promotions, rewards, discounts, loyalty schemes or any other benefits available to you as a customer
- Carrying out any activity required by, or authorised by the government or any legal or regulatory authority in connection with our business generally, or specifically in connection with any legal proceedings, crime, fraud or other unlawful activity prevention, detection, investigation or prosecution

When do we share your information?

We may share your information or receive personal information about you from:

- Credit providers or credit reporting agencies for the purposes permitted under the Privacy Act 1993;
- Parties that assist us with fraud and identity checking including financial institutions and the Government's National Document Verification Service, to verify the validity of any Government issued documentation you provide as proof of identity i.e.: to check a Drivers Licence, Medicare Card, Passport etc
- Debt Collection Agencies
- Law enforcement agencies to assist in the prevention, detection, investigation or prosecution of criminal or other unlawful activities
- Other telecommunications companies for the purposes of dealing with unwelcome calls and number portability issues
- Our dealers, distributors and agents, our network carrier and mobile service partners, our billing, provisioning and mobile network portability service providers, or any other of our related companies for purposes that are connected with providing you with our products and services, and with which you would reasonably expect us to disclose, share or receive personal information about you

We will not disclose or share your personal information with third parties for any purpose other than those described above without your consent, or where there is no specified legal, law enforcement or public health and safety issue involved.

We will not share or disclose your personal information to third parties unless you have consented to us disclosing or sharing your personal information with them, or they have contracted with us to protect your personal information, or they are themselves obligated to protect your personal information.

In some cases, the organisations that we may disclose your information to may be based outside the location where the information is collected. For example, we may share your information with our third parties in Australia, New Zealand and the United States of America. We take reasonable steps to make sure the overseas recipients of your personal information do not breach the privacy obligations relating to it.

Credit reporting

When we are checking your credit worthiness or assessing your credit situation, we might collect credit information from or give information to credit reporting bodies. Credit information can include:

- identification information
- details about information requests made about you to credit reporting bodies
- current and historical details about credit applications you have made and credit arrangements you have entered into
- information about overdue payments, default listings and about serious credit infringements and information about payments or subsequent arrangements in relation to either of these
- various publicly available information like bankruptcy and credit-related court judgments
- credit scores or risk assessments indicating an assessment of your credit worthiness

Credit information relates primarily to your dealings with other credit providers (for example, banks, other financial institutions, or other organisations that may provide you with credit in connection with their products or services). It may also include certain credit worthiness information that we derive from the data that we receive from a credit reporting body. Sometimes we may collect this information about you from other credit providers.

You have the right to access your credit information from us, and to request us to correct that information.

We may disclose your credit information to credit reporting bodies. They in turn may include it in credit reporting information they provide to other credit providers to assist them to assess your credit worthiness.

We may use or disclose your credit information for purposes such as:

- processing credit-related applications and managing credit that we provide
- assisting you to avoid defaults
- if you fail to meet your payment obligations in relation to consumer credit provided by us or commit a serious credit infringement, we may be entitled to disclose this to the credit reporting agency;
- collecting amounts you may owe us in relation to such credit and dealing with serious credit infringements
- participating in the credit reporting system
- dealing with complaints or regulatory matters relating to credit or credit reporting
- when required or authorised by another law

You have the right to request credit reporting bodies not to

- use your credit eligibility information to determine your eligibility to receive direct marketing from credit providers; and
- use or disclose your credit eligibility information if you have been or are likely to be a victim of fraud

You can find out more about the credit reporting body we work with at www.equifax.co.nz. Their websites give their contact details and their policies about the management of your personal information.

Unique Identifiers

Pivotel NZ will assign every account holder a unique identifier to use in our operations, this is necessary to carry out our customer functions efficiently.

How can you make a privacy complaint?

You can also use our contact details to notify us of any privacy complaint you have against us. We are committed to acknowledging your complaint in a prompt manner and will give you an estimated timeframe for when we will respond to your complaint.

If your complaint is in relation to a credit reporting issue, we will acknowledge your complaint in writing as soon as practicable within 7 days. We will aim to investigate and resolve your complaint within 30 days of receiving it. If we need more time, we will notify you about the reasons for the delay and indicate a new estimate time frame. We may need to consult with a credit reporting body or another credit provider to investigate your complaint.

While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, you may also be able to lodge a complaint with the Privacy Commissioner.

How to contact us

You can contact our customer care team on 0508 882 448, or by sending an email to mail@pivotel.com.au or fill in our online contact form at <https://www.pivotel.co.nz/contact-us/>

If you need to write to us our contact details are:

Pivotel New Zealand Limited
79 The Esplanade
Petone 5012
New Zealand

PO Box 38-415
WMC 5045

Fill in our online contact form at <https://www.pivotel.co.nz/contact-us/>