

Privacy Policy

Introduction

The 3-9 Church St Holdings Ltd trading as SecuraPark and our related entities (in this Privacy Policy called “SecuraPark”, “we”, “us” or “our”) is a company that delivers tailored carparking and storage solutions for all domestic and commercial needs.

We respect the privacy of any personal information that you may provide to us. The way we manage personal information is governed by:

- New Zealand – the Privacy Act 2020.

For the purposes of this Privacy Policy, “personal information” has the meaning given to it in the Privacy Act, being information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information or opinion is recorded in a material form.

This Privacy Policy explains how we manage the personal information we hold about you. Please note that this Privacy Policy is to be read subject to any overriding provisions of law or contract.

Your acknowledgement and consent

By using our website, corresponding with us, providing us with personal information, by holding an account or storing with us, you are taken to have read and understood this Privacy Policy and you have consented to us managing your personal information in the way described in this Privacy Policy.

What kinds of personal information do we collect?

The kinds of personal information we may collect include, but are not limited to:

- your full name (including current and any former name) and date of birth;
- your personal and business contact details (including addresses, landline or mobile phone numbers, fax numbers and e-mail addresses);

- your image, location and movements on closed circuit television (CCTV);
- your employment details (including company names, job titles and business sector details);
- your personal information provided through business dealings where a business relationship is established;
- contact and identification details of any third party that has been authorised to negotiate or provide personal information on your behalf (including any attorneys appointed by you under a power of attorney);
- any information required for security reasons (for example, your image, location and movements on closed circuit television or a copy of your passport or driver's licence).
- any correspondence or dealings between you and Securapark; and
- any other personal information provided to us when you make an inquiry, request information (including our information packs, quotes and information about our related products and services), respond to marketing or lodge a complaint.

This information is generally collected through, for example, car parking/storage bookings and payments, online queries or administration processes or business dealings with you.

How do we collect personal information?

Wherever possible, we will always try to collect personal information directly from you. For example where you:

- request information or contact us through our website or by telephone;
- correspond with us in writing (such as letters and emails);
- provide business cards or other documents to our personnel, including:
 - contracts;
 - public records; and
 - identification information for the purposes of confirming an identity; or
- meet with us in person.

We may also obtain personal information about you from third parties that we deal with, such as:

- government and law enforcement agencies;
- our professional advisors;
- any person you authorise to deal with us on your behalf;
- our contracted service providers; and

- any other organisation with whom we do business.

Where we collect personal information from third parties that have been referred by you, we will assume, and you should ensure, that you have made that third party aware of the referral and the purposes of collection, use and disclose the relevant personal information.

Dealing with SecuraPark anonymously

Whenever it is lawful and practicable, you will have the option of not identifying yourself when dealing with us. For example, general access to our website does not require you to reveal any personal information about yourself, nor do general enquiries require personal information to be collected.

However, there are aspects of our activities, services and products that require personal information to be disclosed. For example, due to the contractual nature of the car parking/storage agreement, customers must sign agreements in their legal names. There are also parts of our website where personal information is collected for a specific purpose, such as to provide customers with certain requested information or publications. We do this through the use of online forms, emails, or other communication methods (i.e. over the telephone or by mail).

Why do we collect, hold and use and disclose personal information?

We collect, hold, use and disclose your personal information in order to provide you with your requested services and products as well as to perform our other functions and activities related to those services and products.

In particular, we may collect, hold, use and disclose your personal information for the purposes of:

- responding to your parking/storage booking or other request or inquiry;
- providing you with any documents, records, information sheets or other service information requested;
- if you have requested us to do so – assisting you in your application for insurance over your storage contents;
- effectively carrying on a business or other commercial relationship;
- account management and administering, updating and maintaining our records;
- promotion of our services, including carrying out direct marketing (for example about our products and services and those offered jointly or

on behalf of other organisations) and market research campaigns (for example on the effectiveness of our services). In certain cases we may aggregate your personal information (so that you are not identifiable) for marketing and strategic purposes;

- monitoring and maintaining the safety and security of our site and facilities, and to record, investigate and analyse any incidents which occur on our site and facilities;
- detecting and deterring the inappropriate, unauthorised, suspicious or criminal use or behaviour on our sites and facilities
- developing our website (for example using customer feedback to make the website more user-friendly) and other customer service processes;
- notifying you about important changes or developments to our functions, activities, services or our website;
- administering, supporting, improving and developing our business and services;
- any other purpose which relates to or arises out of requests made by customers, employees or any other persons with whom we have a business relationship;
- if a complaint is lodged with us, processing and responding to the complaint;
- doing anything which you authorise or consent to us doing; or
- taking any action we are required or authorised by law to take.

Except with an individual's permission, we will not sell, trade or rent personal information to unaffiliated third parties.

Disclosure of personal information

In providing our services and carrying out our functions and activities listed above, we may disclose your personal information to:

- related entities within the SecuraPark corporate structure;
- our employees;
- our business partners, stakeholders, service providers or suppliers (such as operating software providers, removalists, registry service providers or contractors who provide a website, IT, marketing, administration and other services to support our activities and functions);
- providers of industry databases and customer screening services
- our professional advisors – for example, our insurers, auditors, lawyers and consultants;
- our affiliated insurance brokers – if you have requested our assistance to obtain insurance for your storage contents;

- any entity to whom we are required or authorised by law to disclose personal information – including law enforcement agencies (such as, New Zealand Customs Service, and New Zealand Police) and government and regulatory authorities;
- credit reporting bodies – if you have defaulted on the payment of your car parking/ storage rental or other fees;
- any successors in title to our business (including new business partners or owners if we enter into a joint venture with or is sold to or merged with another entity); and
- with your consent (express or implied)- other entities.

The above entities may, in turn, disclose your personal information to other entities as described in their respective privacy policies or notices.

Social media

If you communicate with us through social media sites or third party applications (for example, via applications on your smart phone), we may collect information associated with that communication (which may include your personal information). If this occurs, we assume that you have informed yourself of the ways such sites or applications can collect, use and disclose your personal information to others (including SecuraPark) and we also assume that you have consented to associated collections, uses and disclosures by SecuraPark and third parties as a result of the communication.

We may also compile lists of our followers (and what they have posted) on social media. In some cases, your social media identity could amount to personal information. We may also receive aggregated, non-personal statistics on social media coverage of SecuraPark.

Direct marketing

We may also use your personal information to provide you with information about our products and services. If you do not wish to receive this information, please contact us using our Contact Details below.

After you have told us you no longer wish to receive marketing or promotional material from us, we will not send you further promotion material.

However, there may be times when the law requires us to provide certain information to you (for example, any health and safety information). We will continue to send this information to you.

If you do change your mind in the future about receiving marketing or promotional material from us, please contact us.

Dealing with us online

This Privacy Policy also applies to your use of our website and any personal information that is provided to us via our website.

We believe it is important for you to know how we treat your personal information and how we carry out data processing practices through the use of the Internet and any other electronic communications networks.

When you visit our website, we and/or our contractors may collect certain information about your visit. Examples of such information may include:

Cookies

Cookies are small amounts of information which we may store on your computer (after you register on our website) to enable our server to collect certain information from your web browser. Cookies in themselves do not identify the individual user, just the computer used. Cookies and other similar technology make it easier for you to log on to and use the website during future visits (for example they may maintain a shopping basket for storage booking orders and requests). Cookies will also allow us to monitor website traffic, to identify when you visit our website, to personalise the content of the website for you and to enable transactions to be carried out and information about customer accounts to be accessed.

Cookies themselves only record which areas of the site have been visited by the computer in question, and for how long. Allowing us to create a cookie does not give us access to the rest of your computer and we will not use cookies to track online activity once you leave the site. Cookies are read only by the server that placed them and are unable to execute any code or virus.

Site visit information

We collect general information about your visit to our website. The information collected is not used to personally identify you, but instead may include your server address, the date and time of your visit, the pages you accessed and the type of internet browser you use. This information is aggregated and used for the purposes of system administration, to prepare statistics on the use of our website and to improve its content

Security and storage of personal information

We will take reasonable steps to protect your personal information from loss, misuse, unauthorised access, modification or disclosure. We may store personal information in different forms, including in hardcopy and electronic form. We have implemented various policies, procedures and systems to keep your personal information secure.

When your personal information is no longer required, we will take reasonable steps to destroy, delete or de-identify the personal information in a secure manner. However, we may sometimes be required by law to retain certain information.

Overseas disclosure of personal information

We may engage service providers located overseas to perform certain functions and activities. One of our current software system service providers, Storman Software Pty Ltd, is located in Australia. In the course of providing services to you, we disclose your personal information to Storman Software Pty Ltd.

If overseas service providers are engaged and personal information is sent overseas, we will take reasonable steps to ensure that our service providers are carefully chosen and have policies, procedures and systems in place to ensure your personal information is otherwise handled in accordance with the Privacy Act.

Access and correction

To effectively conduct business, it is important that the personal information we hold about you is complete, accurate and current. At any time while we hold your personal information, we may ask you to tell us of changes to your personal information. Alternatively, if you believe that any of the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading and needs to be corrected or updated, we encourage you to please contact us using the details provided below.

We will respond to a request to correct personal information within a reasonable time. If we decide not to correct the personal information, we will provide you with written reasons for our decision as well as the options available to you. You may also request access to the personal information we hold by contacting us using our details provided below.

We will respond to a request for access within a reasonable time, either by giving you access to the personal information requested or by notifying you of our refusal to give access. If we cannot respond within a reasonable time, we will contact you and provide a reason for the delay and an expected timeframe for finalising the request.

We will not charge an application fee for making a request to access the personal information we hold about you or for making any corrections to personal information. However, in certain circumstances we may charge you a fee for providing you with access to your personal information, for example, if you make multiple requests for information, the information requested is voluminous or we incur third party costs in providing you access to your personal information.

We may also request to verify your identity before responding to any request.

If we decide not to provide you with access to or correct your personal information, we will provide you with written reasons for our decision and detail the further complaint mechanisms available to you.

Lodging a complaint

If you have a complaint about how we handle your personal information, we encourage you to contact us using the contact details provided below. Please note that we require complaints to be made in writing.

We will acknowledge receipt of the complaint as soon as practicable after receiving the complaint in writing. We will then investigate the circumstances of the complaint and provide a response to you within a reasonable timeframe.

If you are still not satisfied with how the complaint is handled by us, then you may lodge a formal complaint with the Privacy Commissioner at:

New Zealand customers

- Telephone: 0800 803 909 (from 8.30am to 5pm, Monday to Friday)
- Telephone: 04-474 7590 (Wellington)
- Telephone: 09-302 8680 (Auckland)
- Post: PO Box 10-094, The Terrace, Wellington 6143.
- Fax: (04) 474 7595
- Email: enquiries@privacy.org.nz
- Visit: Level 8, 109-111 Featherston Street, Wellington 6143

- Visit: Level 13, WHK Tower, 51-53 Shortland Street, Auckland 1140

What entity does this Privacy Policy apply to?

This Privacy Policy applies to 3-9 Church St Holdings Ltd trading as SecuraPark

What website does this Privacy Policy apply to?

This Privacy Policy applies to the following web site which are owned and operated by SecuraPark:

Domain Name	Website URL
<u>Securapark.co.nz</u>	https://www.securapark.co.nz

Contacting Us

If you wish to contact us regarding our handling of your personal information or any of the matters covered in this Privacy Policy, you may do so in a number of ways.

Complaints may be lodged by submitting email us at enquiries@securapark.co.nz

We welcome any questions or comments regarding our Privacy Policy.

Changes to this Privacy Policy

We reserve the right to revise or supplement this Privacy Policy from time to time. Any updated version of this Privacy Policy will be posted on our websites as listed above and will be effective from the date of posting.

We recommend that you bookmark and periodically review the Privacy Policy so that you remain aware of the way in which we handle personal information.

This Privacy Policy was last updated on 1 January 2019.