



Communicating to your community

## **Privacy policy**

This privacy policy ("Policy") describes how Communicate Media Limited ("Communicate Media Limited", "we", "us" or "our") collects, protects and uses the personally identifiable information ("Personal Information") you ("User", "you" or "your") may provide on the [communicatemedia.co.nz](http://communicatemedia.co.nz) website and any of its products or services (collectively, "Website" or "Services").

It also describes the choices available to you regarding our use of your Personal Information and how you can access and update this information. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

### **Automatic collection of information**

When you visit the Website our servers automatically record information that your browser sends. This data may include information such as your device's IP address, browser type and version, operating system type and version, language preferences or the webpage you were visiting before you came to our Website, pages of our Website that you visit, the time spent on those pages, information you search for on our Website, access times and dates, and other statistics.

Information collected automatically is used only to identify potential cases of abuse and establish statistical information regarding Website usage. This statistical information is not otherwise aggregated in such a way that would identify any particular user of the system.

### **Collection of personal information**

You can visit the Website without telling us who you are or revealing any information by which someone could identify you as a specific, identifiable individual. If, however, you wish to use some of the Website's features, you will be asked to provide certain Personal Information (for example, your name and e-mail address). We receive and store any information you knowingly provide to us when you fill any online forms on the Website. When required, this information may include the following:

- Personal details such as name, country of residence, etc.
- Contact information such as email address, address, etc.

You can choose not to provide us with your Personal Information, but then you may not be able to take advantage of some of the Website's features. Users who are uncertain about what information is mandatory are welcome to contact us.

### **Storing personal information**

We will retain and use your Personal Information for the period necessary to comply with our legal obligations, resolve disputes, and enforce our agreements unless a longer retention period is required or permitted by law. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to

erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of the retention period.

### **Use and processing of collected information**

In order to make our Website and Services available to you, or to meet a legal obligation, we need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services. Some of the information we collect is directly from you via our Website. However, we may also collect Personal Information about you from other sources. Any of the information we collect from you may be used for the following purposes:

- Improve products and services
- Send administrative information
- Send marketing and promotional communications
- Improve user experience
- Post customer testimonials
- Enforce terms and conditions and policies
- Protect from abuse and malicious users
- Respond to legal requests and prevent harm
- Run and operate our Website and Services

Processing your Personal Information depends on how you interact with our Website, where you are located in the world and if one of the following applies: (i) You have given your consent for one or more specific purposes. This, however, does not apply, whenever the processing of Personal Information is subject to European data protection law; (ii) Provision of information is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof; (iii) Processing is necessary for compliance with a legal obligation to which you are subject; (iv) Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in us; (v) Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party.

Note that under some legislations we may be allowed to process information until you object to such processing (by opting out), without having to rely on consent or any other of the following legal bases below. In any case, we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **The rights of users**

You may exercise certain rights regarding your information processed by us. In particular, you have the right to do the following: (i) you have the right to withdraw consent where you have previously given your consent to the processing of your information; (ii) you have the right to object to the processing of your information if the processing is carried out on a legal basis other than consent; (iii) you have the right to learn if information is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the information undergoing processing; (iv) you have the right to verify the accuracy of your information and ask for it to be updated or corrected; (v) you have the right, under certain circumstances, to restrict the processing of your information, in which case, we will not process your information for any purpose other than storing it; (vi) you have the right, under certain circumstances, to obtain the erasure of your Personal Information from us; (vii) you have the right to receive your information in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that your

information is processed by automated means and that the processing is based on your consent, on a contract which you are part of or on pre-contractual obligations thereof.

### **Privacy of children**

We do not knowingly collect any Personal Information from children under the age of 13. If you are under the age of 13, please do not submit any Personal Information through our Website or Service. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through our Website or Service without their permission.

If you have reason to believe that a child under the age of 13 has provided Personal Information to us through our Website or Service, please contact us. You must also be old enough to consent to the processing of your Personal Information in your country (in some countries we may allow your parent or guardian to do so on your behalf).

### **Newsletters**

We offer electronic newsletters to which you may voluntarily subscribe at any time. We are committed to keeping your e-mail address confidential and will not disclose your email address to any third parties except as allowed in the information use and processing section or for the purposes of utilizing a third-party provider to send such emails. We will maintain the information sent via e-mail in accordance with applicable laws and regulations.

In compliance with the CAN-SPAM Act, all e-mails sent from us will clearly state who the e-mail is from and provide clear information on how to contact the sender. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting us.

### **Remarketing**

We also may permit certain third-party companies to help us tailor advertising that we think may be of interest to users and to collect and use other data about user activities on the Website. These companies may deliver ads that might place cookies and otherwise track user behaviour.

### **Do Not Track signals**

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. How browsers communicate the Do Not Track signal is not yet uniform. As a result, this Website is not yet set up to interpret or respond to Do Not Track signals communicated by your browser. Even so, as described in more detail throughout this Policy, we limit our use and collection of your personal information.

### **Affiliates**

We may disclose information about you to our affiliates for the purpose of being able to offer you related or additional products and services. Any information relating to you that we provide to our affiliates will be treated by those affiliates in accordance with the terms of this Privacy Policy.

## **Links to other websites**

Our Website contains links to other websites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other websites or third-parties. We encourage you to be aware when you leave our Website and to read the privacy statements of each and every website that may collect Personal Information.

## **Information security**

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of Personal Information in its control and custody. However, no data transmission over the Internet or wireless network can be guaranteed. Therefore, while we strive to protect your Personal Information, you acknowledge that (i) there are security and privacy limitations of the Internet which are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between you and our Website cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third-party, despite best efforts.

## **Data breach**

In the event we become aware that the security of the Website has been compromised or users Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law. When we do, we will send you an email.

## **Changes and amendments**

We may update this Privacy Policy from time to time in our discretion and will notify you of any material changes to the way in which we treat Personal Information. When changes are made, we will post a notification on the main page of our Website. We may also provide notice to you in other ways in our discretion, such as through contact information you have provided. Any updated version of this Privacy Policy will be effective immediately upon the posting of the revised Privacy Policy unless otherwise specified. Your continued use of the Website or Services after the effective date of the revised Privacy Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Data in a manner materially different than what was stated at the time your Personal Data was collected.

## **Acceptance of this policy**

You acknowledge that you have read this Policy and agree to all its terms and conditions. By using the Website or its Services you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to use or access the Website and its Services.

## **Contacting us**

If you would like to contact us to understand more about this Policy or wish to contact us concerning any matter relating to individual rights and your Personal Information, you may send an email to [Info@communicatemedia.co.nz](mailto:Info@communicatemedia.co.nz)

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