

Snapper Services Limited Privacy Policy

Last updated 8th September 2016.

1. Scope

The Website, Online Accounts, Cards, and Card system, are operated by Snapper Services Limited of 97 The Terrace, Wellington, New Zealand (“we”, “us”, “our”). This privacy policy (“Privacy Policy”) forms part of (and must be read in conjunction with) the Snapper Terms of Use (“Terms”). Where a definition is set out anywhere in the Terms, that definition shall apply to this Privacy Policy unless the context otherwise requires. This Privacy Policy applies to all information that we collect about identifiable individuals (“you”, “your”).

2. Your Privacy

We are committed to protecting your privacy, and all personal information that you supply to us will be treated in accordance with the Privacy Act 1993 (“Privacy Act”). This Privacy Policy explains how we may collect, store, use, and disclose the personal information provided by you.

3. Collection of personal information

You may voluntarily provide us with your personal information to enable us to provide you with information or services, respond to your enquiries, carry out a transaction that you have requested, or otherwise use that information in accordance with this Privacy Policy.

We may also use automated tools, methods, and systems to collect certain information about you automatically when you use the Card, your Online Account, or the Website. We may collect personal information as follows:

3.1. Card ordering – General

When you order a Card from us, either by phone or the Website, we will collect personal information from you, including:

- your name, delivery address, and phone number for the purposes of ensuring that you receive the Card
- payment details and preferences, for example, credit card details, so that we can charge you for ordering the Card. We do not keep the credit card details in our system unless requested to do so for Auto Top ups (feature not available yet)

3.2. Card ordering – Registered Cards

When you register your Card, we will collect the following additional information from you:

- your email address
- whether or not you want to have SMS alerts or Auto Top ups enabled (when those services are available)
- whether you wish to receive marketing materials from us or third parties
- any additional information which we may collect from you in the future to help us provide services to you.

For Registered Cards, the information that we collect when that Registered Card is used will be associated with any personal information that you supply to us. This will enable us to identify you and to communicate with you as the holder of the Registered Card.

3.3. Card ordering – Personalised Cards

When you order a Personalised Card from us, we will collect the following additional information from you:

- your date of birth
- any relevant licences or endorsements you hold
- other attributes relevant for identification purposes (for example, which school or university you attend),
- all of which will enable us to verify your identity.

3.4. Card ordering – Concession Cards

When you order a Concession Card from us, we will collect the following additional information from you:

- evidence of your eligibility to receive a Concession Card (for example, proof of date of birth)
- any additional information which we may collect from you in the future to help us provide services to you.

3.5. Set up an Online Account

When you set up an Online Account, we will collect personal information from you, including your first name and last name, email address and password. We will also collect information concerning whether or not you consent to receive marketing materials from us or third parties. We may in future collect additional information to help us to provide services to you.

3.6. Card use – General

The information that we collect when you use your Card is anonymous and will not enable us to identify you as the holder of that Card unless your card is a Registered Card, a Personalised Card or a Concession Card.

3.7. Card use: Adding Stored Value and Time Passes, Paying for Authorised Products

When you order Stored Value or Time Passes for a Card, or use a Card to pay for Authorised Products, we may collect information about that transaction including:

- date, time, and location of purchase
- nature and value of any Authorised Products, Stored Value, and Time Passes purchased
- when you pay for Authorised Products, the payment method used (i.e. the Card)
- authorised Merchant's name and other Merchant details
- when you order Stored Value or Time Passes, the payment details (for example, credit card or direct debit details).

All of which will enable us to process the transaction, to credit or debit your Card as the case may be, to trace any payments made using the Card, and to answer any queries you or an Authorised Merchant may have about the transaction.

3.8. Card use: public transport journeys

When you use a Card for a public transport journey with a Public Transport Operator, we may collect information about your journey. including:

- date, time, and duration of your journey
- nature and value of your journey (for example, route and fare information)
- payment method used (for example, Stored Value or a Time Pass, when available)
- Public Transport Operator's name and other Public Transport Operator details.

All of which may be passed on to the Public Transport Operator on an anonymous, aggregated basis, in order for the Public Transport Operator to monitor the usage of public transport provided by that Public Transport Operator, or for other statistical purposes.

3.9. Card use: loyalty card

When you use a Card in conjunction with a Snapper-compatible loyalty programme, we may collect information about transactions to which the loyalty programme applies. Such information may include:

- date, time, and location of purchase
- nature and value of any goods or services purchased
- payment method used
- the Authorised Merchant's name and other Authorised Merchant details
- the loyalty programme operator's name and your membership details for that loyalty programme.

All of which may be used by us or by the administrators of the loyalty programme for the purposes of administering the loyalty programme.

3.10. Card use: identification

When you use your Personalised Card as a form of identification, we may collect additional information about you, which may include:

- your date of birth
- any relevant licences or endorsements that you hold
- other attributes relevant for identification purposes (for example, which school or university you attend)

All of which will enable us to verify your identity.

3.11. Card use: access control

When you use your Personalised Card in order to gain access to designated buildings and facilities with Snapper-compatible security and electronic access technology, we may collect additional information about you, which may include:

- a list of the buildings and facilities you are entitled to access
- the reason for your access (for example, your employer's name and your position)
- the frequency and manner in which your Card is used to access the relevant buildings and facilities (including entry and exit times)
- any other information that the entity giving you access requires us to collect.

All of which will enable us to verify your identity and your access rights.

3.12. Card use: ticketing and event access

When you use a Card to purchase tickets for an event, and to enter the event venue at Snapper-compatible events, we may collect additional information about you, which may including:

- date, time, location, and value of the ticket purchase
- ticket and event details
- the Authorised Merchant's name and other details
- the frequency and manner in which your Card is used in relation to that event (including recording your entry and exit at the event venue).

Which will enable us to verify that your Card enables you to have access to the event and which will enable us, if you consent to receive our marketing material, to send you marketing material that we consider may be of interest to you.

3.13. Website and Online Accounts

When you use the Website or your Online Account, we may collect personal information about you, including:

- in relation to the Online Account: your email address, Card number, challenge question and answer to the challenge question (so we can verify your identity)
- IP address and host name used by your computer to connect to the Website
- operating system and the browser your computer uses
- search engine or inbound hyperlink you used to reach the Website
- pages viewed by you
- updated personal information (where you supply this via your Online Account)
- your name and contact details (where you contact us via the Website)
- date, time, and duration of your visit.

Which will enable us to verify your identity, and that you are permitted to use the Website and Online Account that you wish to access. We will also use that information for our statistical purposes.

3.14. Security and fraud prevention

We may gather more extensive information for security and fraud prevention purposes, for example if we have concerns about abnormal usage patterns, or possible security breaches, or fraud.

4. Credit card details

When you provide your credit card details to us, we will use those details only to verify and process payments you request. We will not keep your credit card details unless you have authorised us to do so (for example, to enable Auto Top-ups for a Registered Card).

5. Providing information about others

Where you provide us with personal information about another person (“Third Party Information”) – for example, when you order a card for an employee, friend, or family member – you must:

- advise that person of this Privacy Policy;
- where possible, have that person provide his or her personal information to us directly; and
- in any event, obtain that person’s permission before supplying his or her personal information to us.

You acknowledge that we will collect, use, store, and disclose that Third Party Information in accordance with this Privacy Policy (as if the Third Party Information were obtained from that person directly), and you warrant and represent that we are authorised to do so by the person to whom the Third Party Information relates.

6. Your right not to provide personal information

You may decide not to provide your personal information to us. However, if you do not provide your personal information (or if you provide incorrect personal information), we may be unable to provide you with access to certain information, products, or services. For example:

- if you do not create an Online Account, you cannot register your Card,

- if you do not register your Card, you will not be able to use the Auto Top-up service, view Online Transaction Data, or request a balance transfer if your Card is lost or stolen.

7. Retention and storage

We do not hold any personal information collected in relation to your order for a Card (other than a Registered Card, Personalised Card or Concession Card) for longer than the time necessary to despatch that Card to you.

With regard to Registered Cards, Personalised Cards, Concession Cards and your On-line Account, we may retain all personal information that we collect under this Privacy Policy (on both our active systems and our archive systems) in relation to those Cards, for as long as is necessary for us to carry out the purposes for which such information was collected (including for the purpose of providing services to you). This means that such personal information is likely to be retained for the period of time that we consider your Registered Card, Personalised Card or Concession Card or your On-line Account to be “active” (an “inactive” Card is, where the Card is not used and no Stored Value or Time Passes are added to the Card for a continuous period of 2 years).

The location at which we store your personal information will depend on the nature and purpose of the information and the manner in which you supply it to us. We may use, process, and store your personal information at 97 The Terrace, Wellington, New Zealand and at our other offices and storage facilities (whether in New Zealand or overseas).

8. Our contractors

We may engage specialised information technology contractors or similarly qualified contractors (who have agreed to deal with your personal information in accordance with this Privacy Policy) to analyse, process, and store your personal information on our behalf (whether in New Zealand or overseas).

9. Security

We will ensure that the personal information that you provide us is protected, by such security safeguards as it is reasonable in the circumstances to take, against loss, access, use, modification, disclosure (except with our authority), and other misuse.

In addition, we will ensure that if it is necessary for your personal information to be given to a person in connection with the provision of one of our services, we will do everything reasonable within our powers to prevent the unauthorised use or unauthorised disclosure of the information by that person.

10. Use

The personal information we collect will be used to operate the Website, Online Accounts, Card system, to provide other services that you have authorised or requested, and for accounting, operational, statistical, and (with your permission) marketing purposes. We may also use your personal information to:

- verify and process any application forms or transactions requested by you;
- contact you if we have difficulty in processing a payment or transaction on your Registered Card;
- respond to any questions or correspondence from you;
- analyse usage, trends, and statistics for the Website, your Online Account, the Cards, the Card system, and any related services;
- improve the Website, your Online Account, the Cards, the Card system, and any related services;
- carry out internal research and development;
- provide you with information about a service that you are using (including critical updates and announcements);

- eliminate the need for you to enter repeatedly the same information;
- customise the Website to suit your particular preferences and interests;
- enable us to use, process, or analyse that information for a specific purpose;
- verify your identity or to provide you with a replacement password when you forget the password for your Online Account; and
- carry out any other use that is notified to you at the time of collection, or which is otherwise authorised by you.

11. Disclosure

We will not otherwise disclose your personal information except:

- to our employees, contractors, agents, advisors, and service providers who need to use your personal information for any purpose set out in the section above 'Use' (and who have agreed to deal with your personal information in accordance with this Privacy Policy);
- as set out in this Privacy Policy;
- in aggregate form;
- where your safety, or the safety of others in the community, is at risk; or
- where you have otherwise authorised us to do so.

12. Content to supply of further information and disclosure

With your consent, we may:

- supply you with further information concerning goods and services that we consider may be of interest to you (including contacting you on behalf of Authorised Merchants to advise of special deals and other information about them and their Authorised Products); and
- supply your contact details to Authorised Merchants and other third parties who may contact you directly regarding their respective goods and services.

13. Aggregate information

We may use and disclose, in aggregate, any personal information that we collect under this Privacy Policy, including information which describes and summarises:

- your characteristics and preferences (including demographic information); and
- the frequency and manner in which you use the Website, Online Accounts, Cards, and any related services.

Personal information used and disclosed under this section will be used and disclosed only in aggregate form (i.e. in a manner that does not identify a particular individual). The recipients of such information (for example, the Public Transport Operators; government departments and agencies; regional, district, and city councils; and other organisations) may retain and use that aggregate information for operational, financial, and planning purposes, including:

- carrying out statistical and other summary analysis of the general behaviour and characteristics of users (for example, travel patterns, spend patterns, peak times, website usage);
- measuring and analysing market performance and dynamics;
- diagnosing and solving marketing, sales, and quality issues;
- identifying and resolving capacity and scheduling issues;
- identifying and capturing growth and marketing opportunities; and
- developing new goods and services, and improving existing ones, to better meet your needs.

14. Access and correction

Where we hold your personal information in such a way that it can readily be identified and retrieved, you are entitled to request access to that information or to obtain our confirmation of whether or not we hold that personal information. It is important to us that the personal information we hold about you is accurate, complete, and current. If you have an Online Account, you may log in to your account and update and correct your personal information. You may also contact our privacy officer to request access to, or correction of, your personal information that we hold. We reserve the right to charge a reasonable fee for the preparation and provision of any information you request under this section.

15. Unsubscribing

Where you have requested or authorised us to send you messages (for example, newsletters, alerts, confirmations, and information concerning goods and services which may be of interest to you) you can request us to stop sending you any or all of those messages by taking any one of the following steps:

- using the unsubscribe feature (if present) in any such message;
- if you have an Online Account, logging in to your account and updating the appropriate preferences (if available) for that account; or
- contacting our privacy officer.

Once we have received your request we will, as soon as is practicable, comply with that request.

16. Cookies and sessions

The Website may use cookies and sessions to provide you with certain services or functionality. Cookies and sessions may be used to identify you as an individual user of the Website. We use this technology to, amongst other things:

- personalise your visits to the Website;
- enable us to improve the content, reliability and functionality of the Website;
- enable you to use certain services or functionality, such as your Online Account;
- evaluate the effectiveness of the advertising on the Website; and
- track Website usage patterns.

Accepting a cookie will not give us access to any data on your computer other than the data stored in the cookie. Although you may configure your web browser to not accept cookies, you may experience a loss of functionality as a result.

In addition, our website uses third party cookies from Google Analytics for Display Advertisers, including the Google Analytics Demographics and Interest Reporting feature, which gives us insight into behaviour information relating to visitor age, gender and interests on an anonymous and aggregate level. This will help us to understand browsing behaviour to give you a better experience whilst visiting our sites. You can access information about Google's Privacy Policy [here](http://www.google.com/intl/en/policies/privacy/) (<http://www.google.com/intl/en/policies/privacy/>).

17. Third party websites

The Website may contain hyperlinks to third party websites. We are not responsible for the content of third party websites, or the manner in which those websites collect, store, use, and distribute any personal information you provide. When visiting any third party website from hyperlinks on the Website, we encourage you to review the

privacy statement of that website so that you can understand how the personal information you provide will be collected, stored, used and disclosed.

18. Privacy officer

If you have any questions about this Privacy Policy or about the personal information that we hold about you (or if you wish to complain about the way we have dealt with your personal information), please contact our privacy officer:

Snapper Services Ltd
PO Box 11454
Manners Street
Wellington 6142

0800 555 345

info@snapper.co.nz

19. Changes

We may change or update this Privacy Policy from time to time. When we do so we will also revise the 'last updated' date at the top of the Privacy Policy. We encourage you to review this Privacy Policy from time to time to stay informed about how we deal with your personal information. Your continued use of your Card or our Services constitutes your agreement to this Privacy Policy and any updates posted on this Website from time to time.