

NZRA PRIVACY STATEMENT

NZRA is committed to protecting your data in accordance and compliance with the Privacy Act of 2020 (“**Privacy Act**”) and the Information Privacy Principles (“**IPP**”) set out in section 22 of the Privacy Act. This Privacy Statement applies to personal information collected by NZRA and outlines how we collect, use, store and disclose your personal information, as well as your rights to access and correct the information and how to make a complaint for any breach of an IPP. This Privacy Statement covers all of our products and services and all of our interactions with you.

For the purposes of this Privacy Statement, reference to “**we**”, “**our**” and “**us**” means reference to NZ Roadside Assistance Limited (“**NZRA**”) and reference to “**you**” and “**your**” includes any person who uses our products and services or gives us personal information.

By providing your personal information or using our services, you agree to this Privacy Statement. If you provide information about any other person, then you must have authorisation from that person to do so.

We may change this Privacy Statement at any time and any amendments will be uploaded to NZRA’s website with the amendments effective from the date of upload. This statement was last updated in June 2021.

WHAT INFORMATION DO WE COLLECT?

INFORMATION WE COLLECT

The information that we may collect varies depending on the products and services that are being provided to you, but generally may extend to:

- Your contact information including full name, email address, current street and/or postal address and phone numbers.
- Details of your vehicle including registration number, make, model, colour, year and history of any previous roadside assistance interactions.
- Details of your roadside assistance policy.
- Some insurance details/history for the purposes of accident and Roadside assistance.
- Details of your interactions with us.
- Financial information - when requesting products or services from us, we may collect any relevant payment or billing information, including but not limited to bank account details, direct debit, credit card details, billing address, premium funding and instalment information. We process credit/debit card payments over the phone and through our website via an encrypted merchant services application.
- Membership details of an insurance or automotive association affiliated with NZRA for the purposes of roadside or accident assistance and related services.
- Details of any events that lead to your interactions with us.
- We record inbound and outbound telephone calls with you for training and quality purposes and complaint handling.
- You can visit our website without providing any personal information. We will only collect personal information via our website with your express prior knowledge, for example where you submit an enquiry or application online.
- Email addresses are only collected if you send us a message and they are not automatically added to a mailing list.

COOKIES

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use may identify individual users.

- Cookies can either be ‘persistent’ or ‘session’ based.
- Persistent cookies are stored on your computer, contain an expiration date and are primarily for the user’s convenience.
- Session cookies are short-lived and are held on your browser memory only for the duration of your browsing session; they are used only during a browsing session and will expire when you quit your browser.
- We may use both session and persistent cookies. This information may be used to personalise your visit to our website or assist with analytical information on website visits. We may share your information with third parties for analytics services.

Most internet browsers have a prompt that can be set to accept or reject cookies. If you do not want to accept cookies, you may adjust your internet browser accordingly to either reject cookies, or to notify you when they are being used, however, rejecting cookies may affect the functionality of our website.

WHO WE COLLECT INFORMATION FROM

We collect personal information through different channels either directly from you or indirectly depending on the circumstances. We may obtain personal information from the following sources:

- You directly when you interact with us (such as when you use our website or contact us over the phone).
- Your agents or representatives.

- Our contractors and service providers.
- Your insurance company or other agency for the purpose of providing roadside assistance services, accident assistance, or where a policy has been created that covers you or your related entities. Your policy data is sent to us via emailed files or files sent to our encrypted server.
- Referrals.
- Premium funders.

If we collect details about you from someone else or an agency and or individual affiliated with you, we will take reasonable steps to ensure that the individual concerned has your authority and permission to provide your personal information in accordance with the IPPs.

We may not be able to provide you with certain products or services if you don't provide your personal information to us when requested (for example during a phone call) or if you withdraw your consent for us to collect personal information from other parties.

HOW WE USE YOUR INFORMATION

PRIMARY PURPOSE

We collect, hold, use and disclose your personal information where it is reasonably necessary for us to carry out, or is directly related to, one or more of our functions, services or activities. NZRA's functions, services or activities include (but are not limited to):

- Roadside Assistance.
- Message Taking.
- Afterhours Claims Assistance.
- Insurance Cover.
- Claim Quoting Assistance.
- Repair Management.
- Risk Assessment.
- Accident Management Services.
- Other Consulting Services.
- Call Centre Services.
- Legal Obligations.

For example, we may need to collect, hold, use and disclose your personal information in the following circumstances:

- To contact you about an inquiry, request or complaint.
- To identify you or others specified on an insurance policy.
- Where we are providing you with advice.
- Where we are arranging insurance.
- To assess insurance claims.
- If accident assistance is requested by you or your insurer.
- To process payment of goods or services provided to you.
- To investigate incidents.
- If required or permitted by law.

We do not use or disclose any personal information for any purpose that is unrelated to the provision of our services or that you would not reasonably expect (except with your express consent). We will only use your personal information for the purpose for which it was collected or as consented to.

DIRECT MARKETING

We may also need to collect, hold, use and disclose personal information for direct marketing services including using any email addresses provided to us, to provide you with information and to inform you about our products, services or events or any other direct marketing activity (including third party products, services and events which we consider may be of interest to you). Without the limitation just described, if it is within your reasonable expectations that we send you direct marketing communications given the transaction or communication you have had with us, then we may also utilise your personal information for the purpose of sending you direct marketing communications which we may consider of interest to you. We may request our related parties contact you regarding services or products that may be of interest to you. You have the right to opt-in and opt-out of receiving direct marketing communications.

SALE OR RESTRUCTURE OF BUSINESS

In the future we may consider the sale or restructure of our business or the purchase of other businesses or services. In such circumstances, it may be necessary for your personal information to be disclosed to permit the parties to assess the sale or restructure proposal, for example during a due diligence process. We will only disclose such personal information as is

necessary for the assessment of any sale or restructure proposal and is subject to appropriate procedures to maintain the confidentiality and security of your personal information. In the event a sale or restructure process proceeds, we will advise you accordingly.

WE GENERATE PERSONAL INFORMATION

In the course of providing our products and services, we generate personal information about you that is logged in our customer record management system. The personal information that we may generate about you includes:

- A case log with details relating to an insurance event and records of action taken.
- Correspondence including between our staff and other agencies.

WHEN WE DISCLOSE YOUR INFORMATION

DISCLOSURE TO THIRD PARTIES

Besides our staff, we may share some information with third parties who assist us or are involved in the provision and dispatch of services. Your information will be provided to third parties only in connection with the services we provide to you, or with your consent, as set out below.

Third parties can include our related companies, our agents or contractors, our roadside provider network, insurers, their agents, regulators to provide their services and products, premium funders, other insurance intermediaries, insurance reference bureaus, loss adjustors or assessors, claims handlers, lawyers and accountants, IT techs, prospective purchasers of our business and other business partners. From time to time, we may seek to develop arrangements with other organisations that may be of benefit to you in relation to promotion, administration and use of our respective products and services.

We will not disclose your information to third parties except where disclosure is:

- Authorised by you.
- To any person or entity in New Zealand that provides services to or for us and who needs such information to assist us with the purposes listed in this Privacy Statement.
- To any person or entity overseas that provides services to or for us. We will only disclose your personal information with an overseas entity if we are comfortable they will protect that information in a way that is comparable to NZ privacy law or alternatively, if we receive your consent to do so.
- To anyone that we need to contact to carry out your instructions to us including to individuals named on an insurance policy.
- Necessary for a function of NZRA including for legal or auditing purposes.
- Necessary to facilitate a sale or assignment of NZRA's assets and interests or a restructure.
- Required by law, including to law enforcement authorities, the courts, government agencies, regulatory authorities or third parties, both in New Zealand and overseas, where we are required to or we believe the disclosure will assist us to comply with any law or legal rules or will assist in the investigation, detection and/or prevention of fraud, money laundering or other criminal offences.
- To anyone when it will be used in a way that cannot identify you.

If we do propose to disclose your personal information for any purposes other than those listed above, we will first seek your consent prior to such disclosure or use.

If we give third parties (including their agents, employees and contractors) your personal information, we require them to only use it for the agreed purpose or in relation to services agreed upon between NZRA and that third party. We will take reasonable steps to ensure that third parties are aware of the provisions of this Privacy Statement in relation to your personal information.

TRANSFER OF PERSONAL INFORMATION OVERSEAS

Any personal information provided to NZRA may be transferred to and stored overseas. Personal information may also be processed by staff or other third parties operating outside of New Zealand in the employ of us or one of our suppliers, agents, partners or related companies.

If we do send information overseas, we will only do so if we are comfortable that the overseas entity will protect that information in a way that is comparable to NZ privacy law. In the event that we may need to transfer or share your personal information to an overseas provider who does not have equivalent or comparable privacy law protections in place, we will advise you and seek your express consent to provide your personal information to the provider, prior to sharing this information.

If you do not agree to the transfer of your personal information outside New Zealand, please contact us.

EXPECTATIONS WHEN PROVIDING PERSONAL INFORMATION ABOUT ANOTHER INDIVIDUAL

When you provide us with personal information concerning other individuals, we rely on you to have made them aware that you will or may provide their information to us and how we collect, use, disclose and handle that information in accordance with this Privacy Statement. If you have not attended to this, you must inform us before you provide us with the information.

If we provide you with personal information you must only use this information for the purposes that were agreed to.

Unless an exemption applies or we have agreed otherwise, you must meet the requirements of the Privacy Act when collecting, using, disclosing and handling personal information on our behalf. You must also ensure that any agents, employees, contractors or other person/s with whom information will be shared meet the above requirements.

HOW WE STORE AND PROTECT YOUR INFORMATION

We store personal information in electronic form and occasionally in hard copy records with us or our appointed data storage provider(s) in New Zealand or overseas. Wherever your information is held, we take reasonable steps to:

- Protect any and all personal information that we hold from misuse, interference and loss and to protect the information from authorised access, modification or disclosure either physically or through computer security measures.
- Maintain computer and network security. We use firewalls, anti-virus and anti-spam and other security measures such as user identifiers and passwords to control access to computer systems.
- Train our staff on privacy and security.

If we believe there has been a privacy breach that has or is likely to cause you serious harm, we will contact the Office of the Privacy Commissioner and will notify you as soon as is reasonably practicable.

HOW YOU CAN ACCESS AND CORRECT YOUR INFORMATION

Under the Privacy Act, you have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong.

If you wish to gain access to your personal information, want us to correct, update or amend your information, have a complaint about a breach of your privacy, wish to withhold your consent or opt-out of providing consent to any of the collection/use/disclosure of your information including receiving offers of products or services from us, or have any other query relating to our Privacy Statement, please contact our Privacy Officer at:

Phone: + 64 9 447 0470
Email: operations@nzra.co.nz
Post: Attn Privacy Officer,
New Zealand Roadside Assistance
PO Box 33364
Takapuna, North Shore City, 0740

In accordance with the Privacy Act, NZRA will:

- Give you the opportunity to access the personal information held about you and correct any errors in this personal information, generally without restriction.
- Provide our dispute resolution procedures to you, should you wish to complain about the handling of Personal information by NZRA.

NZRA aims to hold accurate and up to date personal information and we will do our best to make sure that the data we collect, store, use or disclose about you is accurate, complete and up to date. When you receive policy schedules, renewal notices or other documents from your insurance company or any other provider of services to you that is affiliated with NZRA, you should check this information and contact the provider should you consider any of this information to be incorrect.

You can also obtain information on privacy issues in New Zealand on the Privacy Commissioner website at www.privacy.org.nz or by contacting them by email at enquiries@privacy.org.nz or by calling on +64 4 474 7590.