

1. Privacy

- 1.1. Spritely shall not use or disclose any personal information (as that term is defined in the Privacy Act) that it receives in the course of managing the Software in a way which is contrary to the laws applicable to the handling of such information.
- 1.2. Who do we collect personal information about users from:
 - 1.2.1. We collect personal information about users when they provide that personal information to us, including via the website and any related service, through any registration or subscription process, through any contact with us (e.g. telephone call or email), or when they buy or use our services and products
 - 1.2.2. third parties where users have authorised this or the information is publicly available.
 - 1.2.3. If possible, we will collect personal information from users directly.
- 1.3. How we use personal information from users:
 - 1.3.1. We will use personal information from users:
 - *to verify user identity*
 - *to provide services and products to users*
 - *to market our services and products to users, including contacting users electronically (e.g. by email for this purpose)*
 - *to improve the services and products that we provide to users*
 - *to respond to communications from users, including a complaint*
 - *to conduct research and statistical analysis (on an anonymised basis)*
 - *to protect and/or enforce our legal rights and interests, including defending any claim*
 - *for any other purpose authorised by you or the Act.*
- 1.4. Disclosing personal information of users:
 - 1.4.1. We may disclose the personal information of users to:
 - *any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products*
 - *other third parties (for anonymised statistical information)*

- *a person who can require us to supply your personal information (e.g. a regulatory authority)*
 - *any other person authorised by the Act or another law (e.g. a law enforcement agency)*
 - *any other person authorised by you.*
- 1.5. A business that supports our services and products may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand.
- 1.6. Protecting personal information of users
- 1.6.1. We will take reasonable steps to keep personal information of users safe from loss, unauthorised activity, or other misuse.
- 1.7. Accessing and correcting your personal information
- 1.7.1. Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.
- 1.7.2. In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.
- 1.7.3. If you want to exercise either of the above rights, email us at info@spritely.co.nz. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).
- 1.7.4. We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.
- 1.8. Internet use
- 1.8.1. While we take reasonable steps to maintain secure internet connections, if users provide us with personal information over the internet, the provision of that information is at the users own risk.