



Privacy Policy

Last updated: May 2026

1. Purpose of this Privacy Policy

This Privacy Policy intends to provide you with information about how we, as a data controller, may gather and process information we collect from you, or that you provide to us in accordance with applicable data privacy laws. We want you to be confident that when you interact with the Cogo website and/or our products and services, you understand what personal information we are collecting, how we are using it and how we are keeping it safe. Where we rely on consent as our lawful basis for processing, we will seek that consent from you directly – either at the point you register on our platform or before we use your data for a specific purpose, such as marketing or sharing with our Supplier network. You can withdraw any consent you have given at any time by contacting us at privacy@cogo.co.

"Personal data" means any information about you as an individual – including data that, on its own or combined with other information, could reasonably be used to identify you.

2. Who are we?

This is the Privacy Policy for Cogo, a fintech-for-good on a mission to empower consumers and help them reduce their carbon emissions by making informed decisions on energy efficient upgrades. Cogo's core product, the Home Electrification Platform, helps home and vehicle owners choose the best energy efficient upgrades for their home and vehicle, reducing their carbon footprint along the way. Cogo's Carbon Insights product helps consumers measure, manage and reduce CO₂e emissions. Carbon literacy is the foundation for carbon-conscious action and understanding their own carbon footprint enables individuals to know where and how best to make reductions. Carbon Insights categorises a user's transactions and assigns an emissions factor to each transaction, giving consumers insight into their carbon footprint. Cogo offers services through our Home Electrification platform and our Carbon Insights product; these are referred to in this policy as our "service" or "services".

Cogo is owned and operated by Cogo Connecting Good Limited in New Zealand with a registered address at Level 5 Rutherford House, 23 Lambton Quay, Pipitea, Wellington, 6011, New Zealand, company number 5957234, and with registered entities operating in:

- New Zealand: Cogo NZ Ltd, company number 8331781
- United Kingdom: Cogo Connecting Good Ltd, FC035290
- Australia: Connecting Good Australia Pty Limited, ABN: 42 647 475 107

When we refer to our trading name "Cogo" or "we", "us" or "our" within this policy, we are referring to Cogo Connecting Good Limited and all its entities listed above. We are the data controller for the information we collect from you, or you provide to us, meaning that we will determine the purposes and methods that your personal data is processed and we will do so in accordance with relevant information privacy regulations.

3. Contact us

To make contact in relation to this Privacy Policy, you can reach Cogo's Data Privacy Officer at privacy@cogo.co, or write to us at any of our registered offices:

- NZ: Cogo Privacy Officer, PO Box 606, Wellington, 6140, New Zealand
- UK: Cogo Privacy Officer, % Herschel House, 58 Herschel Street, Slough, SL1 1PG
- Aus: Cogo Privacy Officer, % PO Box 1508, Neutral Bay, NSW, 2089, Australia

Concerns or unresolved privacy issues must be lodged with the relevant supervisory body:

- New Zealand: [Privacy Commissioner Te Mana Mātāpono Matatapu](#) (PC)
- United Kingdom: [Information Commissioner's Office](#) (ICO)
- Australia: [Office of the Australian Information Commissioner](#) (OAIC)

We welcome the chance to deal with any concerns in the first instance and would appreciate you getting in touch.

4. When this Privacy Policy applies

This Privacy Policy applies when a user uses Cogo Services (including the Cogo website, the Home Electrification platform, Carbon Insights and/or any other online service created or hosted by Cogo from time to time that references this Privacy Policy).

Additionally, this Privacy Policy applies:

- where you submit information for a job application/work placement;
- your supply of services to us where this involves any personal data; and/or
- to any personal information collected from third parties where we are the controller of such information.

This Privacy Policy does not apply to, and Cogo is not responsible for, any third-party websites that may be accessible through links from Cogo's website and/or our other services.

5. How is your personal data collected?

Collection methods include:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us in person, by email, by phone, by post or otherwise. This includes personal data you provide when registering to, and using our services.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see the [Cogo Cookies Policy](#).
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources, for example, analytics providers such as Google, or Social Media Platforms. For more information see the Analytics and advertising section below. Any information gathered through these channels will be governed by the privacy



settings, policies, and/or procedures of the applicable platform, which we strongly encourage you to review.

6. How we use your personal data

We use your personal data only when it is required.

This includes:

- **Contract:** Where we need to perform the service you have signed up for, i.e., to compile and send your personalised energy upgrades guidebook.
- **Consent:** Where we have your prior consent to use your personal data, e.g., where you have consented to receive marketing, or consented for our Supplier network to contact you to quote for a home upgrade.
- **Legitimate Interest:** Where it is necessary for our legitimate interests (or those of a third party) and where your interests and fundamental rights do not override those interests. We do not sell or transmit any of your personal data. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Legal:** Where we have a legal or regulatory responsibility to do so.

Below is a table of our intended use of your personal data, our lawful basis for processing it in this way, and the types of data we will process in order to fulfill this purpose. Wherever possible we will not process your data, however we may not be able to do some or all of these things below without doing so.

If at any time we intend to change the purpose for which we hold your personal data, for example to offer you with a complementary service that we may provide in the future, we will give you prior information of that new purpose so you are aware of this and will seek your direct consent where legally required.

Purpose / activity	Lawful basis for processing this data	Type(s) of data used
Registering you for Cogo Services	Contract	Registration Information
Managing our relationship with you, including notifying you about changes to terms and conditions and/or this privacy policy	Contract; Legal obligation	Email address
To understand our user base better	Legitimate interests: to understand how different groups of users engage	Registration Information, Additional Personal

	with our services to ensure it remains relevant, effective and accessible. Processing is limited to aggregated and pattern-based analysis of registration and usage data. No individual-level decisions are made on this basis.	Information
To create anonymised and aggregated market research	Legitimate interests: producing anonymised, aggregated insights about energy-related consumer behaviour to support the broader mission of carbon reduction. Personal data is processed only to the extent necessary to generate anonymised outputs – no individually identifiable data is disclosed.	Anonymised and aggregated registration information, account and transactional information and technical information
To carry out our obligations arising from any contracts entered into between you and us	Contract	Email address, registration information, additional personal information, location services
To facilitate our internal business operations, including to fulfill our legal or regulatory requirements and to maintain and update our records	Contract, Legal obligation	Email address, registration information, additional personal information
For our business purposes, including data analysis, submitting invoices, detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement	Contract, Legal obligation	Email Address, registration information, additional personal information
To provide user support and technical instructions including via email, online chat form, and live chat with a support agent	Contract	Registration information, Account and Transactional information, Technical information and Support communication content

To monitor and improve our services	Legitimate interests: service quality: maintaining, improving, and securing our services so they function as intended. This includes monitoring technical performance, identifying and resolving errors, understanding how features are used to prioritise improvements. Processing is limited for these operational purposes.	Registration information, technical information, additional personal information
To provide you on an ongoing basis with information and services, including relevant marketing communications related to Cogo, and other information or materials	Consent	Registration information, technical information, additional personal information
Use of strictly necessary cookies (e.g., security, session management, load balancing)	Legitimate Interests (and PECR exemption for strictly necessary cookies). These cookies are essential for the services to operate securely and reliably.	Technical information
Use of functional and analytical cookies	Consent. These cookies help enhance usability, and/or help us understand how visitors interact with the service which helps us improve the service.	Technical information
As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.	Legal	As required by law
To retrieve property and energy performance certificate (EPC) data for a user's home to provide personalised energy efficiency insights and carbon emission information	Consent. You choose to provide your home address for this purpose. You may withdraw consent at any time.	Home address, property characteristics, EPC rating
To send your personalised home energy guidebook by	Consent. You choose to provide your email for this purpose. You may	Registration information, home

email, and other pertinent information	withdraw consent at any time.	address, property characteristics, EPC rating, email, additional personal information
To share your contact information and interest in energy efficient home upgrades with suppliers (such as installers and energy efficiency providers) within the Cogo network, so that they may contact you with relevant quotes or information	Consent. You choose whether to share your information with suppliers for this purpose. You may withdraw your consent at any time by contacting us, after which your details will no longer be shared. Note that withdrawal of consent does not affect any communications already initiated by suppliers prior to withdrawal.	Name, email address, home address, EPC rating and energy efficiency recommendations, expressed interest in specific upgrade types (e.g. insulation, heat pumps, solar)

7. Artificial Intelligence and Agentic AI

We may use artificial intelligence (AI) tools to support certain features of our services. When doing so, we do not send any information that directly identifies you (such as your name or contact details) to these systems. We do not use your data to train AI models. Any use of AI is designed to operate on limited, non-identifying information and in a way that protects your privacy. Cogo takes AI use seriously. Our strict internal policy ensures that any use of AI tools upholds our commitments to data security, client confidentiality, ethical responsibility, and the accuracy of our work product.

You have the right to request human review of any AI-generated output that relates to you. To exercise this right, please contact us at privacy@cogo.co.

8. Analytics and advertising

As with most companies, Cogo engages with third party providers for analytics and advertising information. Any information gathered through these channels will be governed by the privacy settings, policies, and/or procedures of the applicable platform. Below are some of the main analytics and advertising partners Cogo uses, along with information about how you can review and/ or opt out of their services.

Analytics

We use third party analytics providers, including Google, Amplitude, Metabase and others, to collect information about the usage of our online services and enable us to improve how these online services work. The information allows us to see the overall patterns of usage across our services, helps us record any difficulties you have with our services, and allows us to optimise performance. Google Analytics, Amplitude and others use cookies and other similar technologies to collect information about the usage of our online services and to report website and mobile application trends to us, without storing any personal data on external third-party analytics provider platforms.

You can opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>

Advertising

We may from time to time participate in third party advertising partners (such as Google, YouTube, LinkedIn and/or other social media) in remarketing and behavioural targeting programs. These services allow us and our partners to display ads that are likely to be more relevant (such as behavioural or targeted ads that are based on information about your browsing history). This activity is performed by tracking usage data and by using cookies to transfer information to the partners that manage the remarketing and behavioural targeting activity.

- For opting out of ads served by Google, visit <https://support.google.com/ads/answer/2662922?hl=en>
- For opting out of a range of advertising networks, visit <http://optout.networkadvertising.org>.

Facebook (includes Instagram)

We may from time to time post on Facebook and/or Instagram.

You can manage advertising from Facebook by logging into Facebook and going to <https://www.facebook.com/settings/?tab=ads#>.

9. Disclosure of Your Information

In order to provide you with your chosen service, and to maintain our business activities, we may exchange your personal data in the following ways.

- To third-party service providers (data processors) contracted to Cogo. These companies are authorised to use your personal information only as necessary to provide these services to us, and via contractual agreements that establish their responsibilities to protect your data;
- To regulators, authorities or bodies who require reporting of processing activities in certain circumstances. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, or investigate fraud;
- To professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- To create anonymous statistical information about users of our websites and how they interact with them, including with trusted third-party analytics and search engine partners;
- To any other third party with your prior agreement to do so, where such agreement will be recorded by us, and retained in line with our data retention policy, and include the purpose, frequency and duration of the information sharing.

When such third parties no longer need your personal data to fulfil this service, they will dispose of such details in line with Cogo's procedures unless they are themselves under a legal obligation to retain information (provided that this will be in accordance with applicable data privacy laws). If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.



We hold intellectual property rights in the databases and compiled information we create through operating our services. This does not affect your rights over your own personal data – personal data remains yours, and your rights in relation to it are set out in Section 14.

We do not sell, rent, or otherwise share information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Privacy Policy or with your express prior permission.

Where information has been genuinely anonymised and aggregated so that no individual can be identified, we may use and share that information as permitted by applicable law.

10. International Transfers

Personal data we hold may be transferred to, and stored at, destinations outside of your country or the country from which the data were provided. This may happen if one or more of our third party service providers with whom we share personal data in accordance with section 9 (Disclosure of your information) are located, or have their servers located, outside your country or the country from which the data were provided.

Transfers from the United Kingdom

Where we transfer your personal data outside the UK, we ensure an equivalent level of protection is afforded to it by relying on at least one of the following safeguards:

- The destination country has been the subject of UK adequacy regulations made by the UK Secretary of State, meaning it is recognised as providing an adequate level of protection for personal data. For further details, see the ICO's list of countries with UK adequacy decisions.
- Where we use providers based in the United States, we may transfer data under the **UK-US Data Bridge**, which allows US organisations that have self-certified under the programme to receive UK personal data with equivalent protections. For further details, see the ICO's guidance on the UK-US Data Bridge.

Transfers from the European Economic Area

Where you are submitting personal data from within the EEA, such information may be transferred to countries outside the EEA. Where this occurs, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The destination country has been deemed to provide an adequate level of protection for personal data by the European Commission.
- We use Standard Contractual Clauses approved by the European Commission, which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

If you would like more information about the specific safeguards we have in place for any particular transfer, please contact us at privacy@cogo.co.

11. Retention of your data

We retain the information we collect no longer than is reasonably necessary to fulfil the purposes that such data was originally collected in accordance with our internal data retention policies or to comply with our legal and regulatory obligations. The table below sets out the length of time we retain your personal data:

What personal data?	How long do we keep it and why?
Data we collect through Google Analytics IP address, location, browser type, device used, operating system, pages accessed and date / time of access.	38 months to be able to track how users are using our services over time, as the website changes, in order to optimise the content we provide and marketing we do
Data Facebook collects through your use of our Facebook page	2 years to track how users are using our Facebook page over time
Data we collect when you contact us	2 years so we can respond to, and follow up on requests
Transaction data when you use Cogo services	13 months to allow us to model to businesses the effects of making sustainability investments
Data we collect through Amplitude Information about website and application browsing, activity, history, and device information	Retained per Amplitude's platform-level settings as we are currently on Amplitude's free plan and cannot configure a custom retention period. This allows us to track how users are using our website over time, in order to optimise the content we provide and marketing we do. We can request deletion of this data via Amplitude at any time.
Property data we collect from the Electrification platform	2 years after the last interaction date as this reflects typical timeframes for home/vehicle upgrade decisions. If a user has not interacted with Cogo after 24 months their personal information (address, phone, name, email) is removed completely. Postcode is retained separately and, together with other data collected from the Electrification platform, is anonymised for aggregated reporting.

12. Security

Security of your personal information is important to us and we follow generally accepted industry standards and best practices to protect your information at all times.

We store information in access controlled premises or electronic databases requiring logins and passwords using best in class technology and practices. All employees, officers or contractors of Cogo and third party providers with access to confidential information are subject to access controls and confidentiality obligations, and we require our third-party data storage providers to comply with appropriate information security industry standards.

Whilst we continually strive to ensure that our systems and controls are updated to reflect technological changes, the transmission of information via the internet is not completely secure, and as such we cannot guarantee the security of your data transmitted to our online services which is at your own risk.

Once we have received your information, we will take all reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

You can help us to keep your information secure by ensuring that any username or password in relation to our online services is kept strictly personal to you and not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using your user details or password.

13. Cookies Policy

Our website and services delivered online use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and to allow us to improve our online services.

You can read about the cookies we use and how to manage them in our [Cookies Policy](#).

14. Online services – Links to third party sites, services and content

In addition to our online services, which we control directly, we also use and provide links to websites which are controlled by third parties, which may include:

- LinkedIn, Instagram and YouTube, where we have certain Cogo accounts and profiles.
- Facebook, where we have a social page.

If you use or follow a link to any of these third-party websites, please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you.

Our online services may include integrated content or links to content provided by third parties (such as suppliers' info, or video materials). This Privacy Policy does not address the privacy, security, or other practices of the third parties that provide such content.

15. Your rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Access to your information (Data Subject Access Request)
- Request correction of your personal data
- Request deletion of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent
- Right to review by an independent authority
- Right to not be subject to solely automated decision-making

If you would like to exercise any of the rights set out in this section, please contact us at privacy@cogo.co. You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

Depending on the nature of the request, we may be required to verify the identity of those who make a request to us. We will accept the following forms of ID when information on your personal data is requested: Passport, Driving licence, Birth certificate, Utility bill dated within the last 3 months.

We may refuse to provide access where we have legitimate reasons for doing so under applicable data privacy laws, and in exceptional circumstances may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision.

We try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than a month, but not more than three months total, if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please note that where you withdraw your consent we will no longer be able to provide you with the products or services that rely on having your consent.

If you are not satisfied with our response to any privacy-related concern you may have, you have the right to lodge a complaint. Please contact the appropriate body in Section 3: Contact Us.

16. Changes to this Privacy Policy

As technologies and information governance practices develop, and data privacy laws (and surrounding guidance) evolve, we may need to revise and update this Privacy Policy from time to time.

We will post any Privacy Policy changes on the Cogo website and our Electrification platform and, where the changes are significant or may materially affect how we process your personal data, we will provide prominent notice or contact you directly, including email where appropriate and, where required by law, we will seek the appropriate consent directly from you.