



Inugo Privacy Policy

Introduction

At Inugo, we care about how your personal data is used and shared, and we take your privacy seriously. Please read the following to learn more about our privacy policy.

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, support queries and so on. If you can't be identified (for example, when personal data has been aggregated and anonymized) then this policy doesn't apply.

Note that Inugo does not save any of your credit card information, as we use a payment processor gateway for credit card payments. Inugo only stores an anonymized digital token received from the payment processor that represents your credit card information held by them. The payment processor will have their own terms & conditions you must agree to in order to use their services.

By using our services, you consent to the sharing of your personal data with parking facility operators as described in this policy. You may withdraw this consent or exercise your data rights (e.g., access, correction, deletion) by contacting us via the Contact Us page, or deleting your account and your data via the mobile or web application.

Changes to this policy

We may change this policy by uploading a revised policy onto our websites. The change will apply from the date that we upload the revised policy.

This policy was last updated on *[insert date]*.

Who are 'we'?

When we refer to 'Inugo', 'we', 'our' or 'us', that means Inugo Systems Limited and all its wholly owned subsidiaries. Our headquarters are in New Zealand but we operate and have offices internationally. Address details for all Inugo offices are available on our Contact us page.

Inugo is a leading provider of innovative parking management and access control solutions. We provide an easy-to-use online platform for gate access control. At the core of our platform, powered by advanced technologies such as license plate recognition ('LPR'), is our parking management software, which enables seamless, secure, and efficient parking experiences for users and facility operators alike. We partner with parking facility operators to



deliver services that optimize access control, streamline payments, and enhance customer satisfaction. Whether through our websites (www.inugo.com and payforyourparking.com), mobile apps, or white-labelled products, we are committed to transforming parking management with transparency, security, and user-focused innovation. For more details about our mission and services, visit our About Us page here: inugo.com/about.

When does this policy apply?

This policy applies across all websites that we own and operate and all services we provide, including our online and mobile parking management and gate access services products, our websites www.inugo.com and payforyourparking.com, and any other apps or services we may offer (for the purpose of this policy, we'll just call these our 'websites' and 'services'). It does not apply to the practices of companies we don't own or control, or people that we don't manage.

In particular, our customers and their customers may collect personal data from individuals (e.g. from individuals who park in parking facilities managed by them and from their employees) using our products and services, including by use of software developed using Inugo's SDK (software development kit) that's integrated into another app, by use of a white-labelled Inugo product with customized bespoke branding, or by use of our LPR technology, and upload, store or process that information to or in our services for us to hold, store and process on their behalf. We refer to the information described in this paragraph as 'Customer Data'.

For the purposes of applicable privacy and data protection laws, when storing or otherwise processing Customer Data, our customer (or their customer) is the *data controller* (or the equivalent under applicable privacy and data protection laws) and we are a *data processor* and/or *service provider* (or the equivalent under applicable privacy and data protection laws). Our customers (and their customers) determine what and how they collect, use, disclose and transfer Customer Data. This means that our customers' (and their customers') collection and use of Customer Data is governed by their privacy policy and practices, not ours.

We require our customers to obtain the necessary consents from individuals to provide Customer Data to us and permit us to collect and use Customer Data for the purposes of providing our services to our customers.

We only process Customer Data as authorized by our customers in our agreements with our customers. Unless otherwise required under applicable law, if we receive any request or inquiry relating to Customer Data, we will forward this request to the relevant customer.



If you're someone who doesn't have a relationship with us, but believe that an Inugo user has entered your personal data into our websites or services, you'll need to contact that Inugo user for any questions you have about your personal data (including where you want to access, correct, amend, or request that the user delete, your personal data).

The remainder of this privacy policy does not apply to Customer Data.

Information collected through use of an Inugo-branded mobile app or web application is not Customer Data, and is governed by this privacy policy.

Our principles of data protection

Our approach to data protection is built around four key principles. They're at the heart of everything we do relating to personal data.

- **Transparency:** We take a human approach to how we process personal data by being open, honest and transparent.
- **Enablement:** We enable connections and efficient use of personal data to empower productivity and growth.
- **Security:** We champion industry leading approaches to securing the personal data entrusted to us.
- **Stewardship:** We accept the responsibility that comes with processing personal data.

How we collect your data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorized into the following:

- **Information you provide to us directly:** When you visit or use some parts of our websites and/or services we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up, respond to an email offer, join us on social media, take part in training and events, contact us with questions or request support. If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.
- **Information we collect when you use a parking facility serviced by us:** When you enter or exit a parking facility serviced by us, we may collect vehicle license plate information through LPR technology, an image of your vehicle (which may include an image of you), parking session information (e.g. time and date of entry and exit), whether or not payment has been processed and the amount of your payment.
- **Information we collect automatically:** We collect some information about you automatically when you visit our websites or use our services, like your IP address, device type, and GPS-based functionality on mobile devices. If you access our services through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this.

We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible (e.g., by personalizing the content you see). Some of this information is collected



using cookies and similar tracking technologies. Refer to our Cookies section below for more information.

- **Information we get from third parties:** The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data we already hold about you, in order to better inform, personalize and improve our services, and to validate the personal data you provide.

Our customers may also provide us with information about whether you are authorized to park in a facility operated by them or their customers, e.g. if you are an employee that is authorized to park in the facility, or if you have a monthly parking lease or permit. We use this information to allow you to access the facility and to assist our customers (and their customers) in managing the facility.

Where a vehicle enters a parking facility serviced by us without paying for parking or being otherwise authorized to park in the facility, we may use the license plate details to look up the vehicle owner on government vehicle ownership database, so that we or the facility operator can take enforcement action.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services (including being unable to allow you to access parking facilities serviced by us), and some functions and features on our websites may not be available to you.

How we use your data

First and foremost, we use your personal data to operate our websites and provide you with any services you've requested (including allowing you to access parking facilities serviced by us), and to manage our relationship with you. We also use your personal data as follows:

For parking management and enforcement: So that we can assist parking facility operators to manage their facilities, including to facilitate access control, customer support, and parking enforcement.

To process payments: To authorise and process credit card transactions (as noted above, we do not save any of your credit card information, as we use a payment processor gateway for credit card payments. We only store an anonymized digital token received from the payment processor, whether or not payment has been processed and the amount of your payment).

To communicate with you: This may include:

- providing you with information you've requested from us (like training or education materials) or information we are required to send to you



- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services
- marketing communications (about Inugo or another product or service we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email, in-app support or otherwise.

To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimize your user experience and provide you with more efficient tools.

To protect, enforce and defend:

- So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our terms of use.
- To protect and/or enforce our legal rights and interests, including defending any claim.

To market to you: In addition to sending you marketing communications, we may also use your personal data to display targeted advertising to you online – through our own websites and services or through third party websites and their platforms.

To analyze, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymized analytics and reports, which we may share publicly or with third parties.

To respond to public authorities, including law enforcement: To respond to lawful requests by public authorities, including to comply with law enforcement requirements.

As otherwise authorized: For any other purpose authorized by you or applicable law.

We may transfer your information in the case of a sale, merger, consolidation, liquidation, reorganization or acquisition.



How we can share your data

We may share your personal data (such as your name, email address, vehicle details, parking session information, whether or not payment has been processed and the amount of your payment) with parking facility operators:

- to enable you to use their services, including for access control and customer support
- for parking enforcement purposes
- to allow them to:
 - improve, develop and protect their services and create new services
 - communicate with you about your use of their services
 - send you information they think may be of interest to you based on your marketing preferences.

We may also share this personal data with enforcement agencies used by parking facility operators for parking enforcement purposes.

Where we use a government vehicle ownership database to look up the owner of a vehicle that has entered a parking facility serviced by us without paying for parking or being otherwise authorized to park in the facility, and you are the registered owner of that vehicle, the personal data we share with the parking facility operator or enforcement agency may include your name and address, even if you were not driving the vehicle at the time.

This sharing is done in accordance with our privacy and data protection principles and applicable privacy and data protection laws.

There will be other times when we need to share your personal data with third parties. We may disclose your personal data to:

- other companies in the Inugo group of companies
- third party service providers and partners who assist and enable us to provide our websites and services and support our operations, for example, any person that hosts or maintains any underlying IT system or data centre that we use to support delivery of or provide functionality on our website or services, or to market or promote our goods and services to you
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
- professional advisers e.g. accountants, lawyers or auditors
- an actual or potential buyer (and its agents and advisors) in connection with an actual or proposed purchase, merger or acquisition of any part of our business
- other people where we have your consent.

We do not share mobile telephone numbers, text messaging originator opt-in data or consent information with third parties or affiliates for marketing or promotional purposes. We may share this information with contractors and subcontractors who support delivery of our



services, but only for the purposes of the provision of services, such as customer service, to us.

Also, we may share information about your use of our website with our trusted advertising and analytics partners through the use of cookies, web beacons, and similar storage technologies. Please refer to our cookie policy below for further information.

International Data Transfers

When we share data, it may be transferred to, and processed in, countries other than the country where you are located – such as to the United States, the United Kingdom or Australia, where our data hosting providers' servers are located, and to New Zealand (where we are located and where we may establish data hosting services). These countries may have laws different to what you're used to. Rest assured, where we disclose personal data to a third party in another country, we put safeguards in place, such as data processing agreements, to ensure your personal data remains protected in compliance with applicable privacy and data protection laws.

New Zealand is recognised by the European Commission and the UK government as a country that has an adequate level of data protection for the purposes of the General Data Protection Regulation of the European Union and the equivalent laws of the United Kingdom, and we rely on these decisions in transferring personal data to New Zealand.

Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and have appropriate technical and organizational measures in place to make sure that happens.

You play an important role in keeping your personal data secure by maintaining the confidentiality of any password and accounts used in relation to our websites and services. You should not disclose your password to third parties. Please notify us immediately if there is any unauthorized use of your account or any other breach of security.

Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business or legal need to retain it, in accordance with our internal data retention policies and practices. Following that period, we'll make sure it's deleted or anonymized. Once data is deleted it will no longer be recoverable.



Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication.

Subject to certain grounds for refusal under applicable law, you also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy or correction of your personal data, or ask us to restrict processing your personal data or delete it. Note that deleted data will no longer be recoverable.
- object to our continued processing of your personal data

You can exercise these rights at any time by making a request from the [Contact Us](#) page. Your request should provide evidence of who you are and set out the details of your request (e.g. the personal data to be corrected and the correction that you are requesting).

If you're not happy with how we are processing your personal data, please let us know by getting in touch from the [Contact Us](#) page. We will review and investigate your complaint, and try to get back to you within a reasonable time frame.

Cookies

Inugo uses "cookies" in conjunction with our services to obtain information. A cookie is a small data file that is transferred to your device (e.g. your phone or your computer) for record-keeping purposes. For example, a cookie could allow the service to recognize your browser, while another could store your preferences and other information.

We may also use other technologies with similar functionality to cookies, such as web beacons and tracking URLs. These may be used to obtain Log Data that informs whether you have opened a certain message or accessed a certain link. For simplicity, when we refer to cookies we also include these technologies.

Inugo, and our third-party business partners, uses cookies for a number of purposes, such as the following:

1. to enable, facilitate and streamline the functioning of our services across different web pages and browser sessions.
2. to simplify your access to and use of our services and make it more seamless.
3. to monitor and analyze the performance, operation and effectiveness of our services, so that we can improve and optimize it.
4. to show you content (which may include advertisements) that is more relevant to you.

Your browser may allow you to set how it handles cookies, such as declining all cookies or prompting you to decide whether to accept each cookie. But please note that some of our services may not work as intended without cookies.

GOOGLE COOKIES



We use Google Analytics to collect information about visitors to our website. Google Analytics collects information related to your device, browser, IP address, network location, and website activities to measure and report statistics about your interactions on our website. We use this information to help us manage the performance and design of our website and to improve our website.

We also use Google Ads.

For further information on how Google uses your personal information when you use our website and how to opt out of Google's use of cookies, see [here](#).

How to contact us

We're always keen to hear from you. If you're curious about what personal data we hold about you or you have a question or feedback for us on this notice, our websites or services, please get in touch.

As a technology company, we prefer to communicate with you by email – this ensures that you're put in contact with the right person, in the right location, and in accordance with any regulatory time frames.

Contact us at support@inugo.com or the Help section of the software app.