

PRIVACY STATEMENT

MOSAIQ TRANSIT INTELLIGENCE SUITE

Last updated 21 September 2026

1 About this document

We are Snapper Services Limited (**'Snapper'** **'we'**, **'us'**, **'our'**), a company incorporated in New Zealand (company number 1891262). Our registered office is Level 9, 1 Willis Street, Wellington 6011, New Zealand.

We operate the website mosaiq.co, including the Global Public Transit Index, and offer the data analytics and reporting software platform known as Mosaic Transit Intelligence Suite, which includes Mosaic Insights and Mosaic Go (together **'Mosaic'**).

This Privacy Statement sets out:

- a what information we might collect about you when you use our Mosaic website, products, apps, or services, or otherwise in connection with our dealings with you in relation to Mosaic;
- b how we might use that information;
- c where we store that information;
- d who we might share that information with; and
- e your rights in connection with that information.

If you are a Mosaic Go user, your use of Mosaic Go may be subject to additional policies and procedures in place at Your Organisation.

You should read this Privacy Statement alongside the terms of use which apply to the product or products which you are using. Our Mosaic terms of use can be found at mosaiq.co.

2 Definitions

In this Privacy Statement, unless the context otherwise requires:

'Mosaic Go' means the Mosaic Go mobile application.

'Mosaic Insights' means the Mosaic Insights product described at mosaiq.co.

'Personal Information' means information about, or relating to, an identified or identifiable individual, as well as the meaning given to that term or to the term 'personal data' by other applicable privacy law (refer to paragraph 3 below).

'Processing' means any operation or set of operations that is used in respect of personal information whether or not by automated means.

'Your Organisation' means, if you are a Mosaic Go user, the public transport network operator that has engaged you to operate a public transport vehicle.

3 Our handling of your personal information

When we collect, store, use, and disclose your personal information, we do so in accordance with:

- a the law in New Zealand that applies to our collection, use, storage and disclosure of personal information, including the Privacy Act 2020 and related codes of practice; and
- b legislation in other jurisdictions that may apply to our provision of services to you, such as (where applicable):
 - i the Australian Privacy Act 1988 (Cth);
 - ii the California Consumer Privacy Act of 2018;
 - iii the European Union General Data Protection Regulation (EU) 2016/679 (the '**EU GDPR**'); and/or
 - iv the UK Data Protection Act 2018 (and the legislation falling within the definition of 'applicable data protection legislation' under the UK Data Protection Act 2018) (together, the '**UK GDPR**').

Generally, we are the 'controller' of the personal information that we collect from you when you interact with us, including when you use our services or access our website.

However, if you are a Mosaiq Go user:

- a Where we collect, hold, use and disclose your personal information to provide our services to Your Organisation, we do so as agent for Your Organisation (in other words, as a 'processor' on behalf of Your Organisation, who is the 'controller', as those terms are recognised under the UK GDPR and the EU GDPR). You should refer to the privacy policies and disclosures issued by Your Organisation to understand how they will process your personal information, and your rights in respect of that information.
- b Where we collect, hold, use and disclose your personal information to provide any services directly to you (including to administer your login and/or personal user account), we do so on our own account (in other words, as a 'controller').

4 Information we collect

Website and general interactions

We may collect the following information from you when you interact with us, whether through our website or otherwise, and including when you use the services offered via our website (such as the Global Public Transit Index):

Personal information collected	When collected	Why collected/lawful basis for processing
Your name, email address, and/or phone number.	When you provide it to us over the course of our interactions with you, including through the contact form on our website.	So that we can identify you and communicate with you.

Personal information collected	When collected	Why collected/lawful basis for processing
		We have a legitimate interest in doing so, to enable us to offer our services to you in a secure and consistent manner.
Information about your job title, company, and the way you have interacted with us in the past, including the work for which you've previously engaged us to provide, and correspondence we've had with you.	When you provide it to us over the course of our interactions with you, including through the contact form on our website.	So that we can identify our services and offerings that are likely to be of relevance and interest of you and your business. We have a legitimate interest in doing so, to enable us to offer our services to you in a secure and consistent manner.
All personal information we collect about you, including the above.	The circumstances described above, and otherwise during your interaction with us.	For the purposes set out in paragraph 10.

Mosaiq customers

When you use our products and applications, such as Mosaiq Insights and Mosaiq Go, we may collect the following information:

Personal information collected	When collected	Why collected/lawful basis for processing
Account details such as your name, email address, and phone number	When you create, or your system administrator creates, an account for you.	So that we can identify you and communicate with you. So that we can register an account for you, facilitate your use of our products and applications, provide you with support (including if you forget your password), and personalise our products and applications for you. We have a legitimate interest in doing so, to enable us to offer our services to you in a secure and consistent manner.

Personal information collected	When collected	Why collected/lawful basis for processing
Information about your use of our products and applications, such as the way you use and interact with our products and applications, where you access our products and applications, and your session times. For Mosaiq Insights, this may include how you interact with the web application (which may include screen recording and enhanced logging).	When you are using or connected to a Mosaiq product or application.	To assist our products and applications to function, and for analytics, research, and product development purposes (including to improve our products, applications and other services).
All personal information we collect about you, including the above.	The circumstances described above, and otherwise during your interaction with us.	For the purposes set out in paragraph 10.

Mosaiq Go

When you use Mosaiq Go, we may also collect:

Personal information collected	When collected	Why collected/lawful basis for processing
The number associated with the phone you use to access Mosaiq Go.	When you create, or your system administrator creates, an account for you, or you otherwise provide it to us.	So that we can register an account for you and facilitate your use of our products and applications. We have a legitimate interest in doing so, to enable us to offer our services to you in a secure and consistent manner.
Information about the location of the device you use to access our app.	When you are using or connected to the app.	So that we can help Your Organisation to keep track of the public transport vehicle you are operating, by providing them live location and tracking data, and otherwise provide our app and services to you. We have a legitimate interest in doing so, to enable us to offer our services to you in a secure and consistent manner.

Additional collection

We may gather more extensive information about your interactions with Mosaiq if we are concerned about abnormal usage patterns or security breaches.

5 Information we receive from others

We may receive your personal information from third parties, for the purposes described in paragraph 4 above. This may include:

- a for customers who receive access to Mosaiq products through authorised resellers, from those resellers;
- b for Mosaiq Insights users, from the administrator responsible for your organisation's access to the platform;
- c for Mosaiq Go users, from Your Organisation (see paragraph 3 above, which explains when we act as agent for Your Organisation in this respect).

We are not required or authorised by any specific law to collect your personal information from these sources.

Where we collect your personal information in this way, we will take reasonable steps to make you aware of the matters set out above, and of your rights to access and correct your personal information (see paragraph 15 below), as soon as reasonably practicable after we collect it (for example, by providing you or Your Organisation with a copy of, or a link to, this Privacy Statement when your account is first created, or in our welcome communications to you). In some cases, we may instead rely on the reseller, administrator, or Your Organisation having already made you aware of these matters, or on it not being reasonably practicable for us to contact you directly at that time.

We may also receive information through our use of third-party websites or services, including analytics tools such as Google Analytics and PostHog. The collection and use of your information by any third party will be subject to that third party's own terms and policies.

6 Consequences of not providing your personal information

Providing your personal information is necessary for you to access and use our websites, products and services. If you do not provide us with your personal information, we may be unable to provide you with access to our websites, products and services.

If you do not wish to use the Mosaiq Go mobile application, you should discuss this with Your Organisation.

7 Information you give us about other people

We may collect information about someone else from you. If you do provide us with someone else's personal information, you must ensure you have that person's authority to do so, and that they are aware their information may be used by us as described in this Privacy Statement, including the purpose for which we are collecting it, our identity and contact details, and their rights to access and correct that information (see paragraph 15 below). Because we will not usually have a way to contact that person directly, we rely on you to pass on these matters to them at the time you provide us with their information.

8 Cookies

Cookies are pieces of information that are automatically downloaded to your computer or mobile device when you use our website or web application. We use cookies to identify you automatically and to help us understand general behaviour and traffic patterns.

9 Marketing communications

We may use personal information we hold about you to send you emails and other electronic messages about our services and other business opportunities that we consider may be of interest to you.

If you do not wish to receive promotional or marketing communications from us, you can opt out by using the unsubscribe facility in the messages we send you, or by contacting us using the details in paragraph 19 below.

10 Other uses of your information

We only use your information in the way described in this Privacy Statement, or as permitted or required by applicable privacy law. In addition to the specific uses described above, we may also use your personal information to:

- a respond to your enquiries and communicate with you;
- b support you in using our services;
- c provide you with important notices and information about Mosaiq and other services we offer;
- d improve the functionality of our services, including testing new or modified functionality and better understanding how our services can help you;
- e conduct research and statistical analysis on an anonymised basis; and
- f comply with our legal obligations.

We may also use your information for any other purposes for which you have given us your consent. When we process your personal information on the basis of your consent, you have the right to withdraw your consent. You can do so by contacting us at info@mosaiq.co, or (if applicable) by using the unsubscribe facilities in our communications to you.

We may combine information we have collected about you with information collected from others, for the purposes described in this Privacy Statement.

11 Where your personal information is held

We and our service providers may store your personal information on servers located in New Zealand, Australia, the United Kingdom, the European Union, and/or the United States. In particular:

- a Amazon Web Services, Inc at its data centres in Australia, Ireland, and/or the United States;
- b PostHog, Inc at its data centres in Frankfurt, Germany.

We may also hold your personal information in physical files at our premises in New Zealand.

New Zealand is a 'white list' country for the purposes of both the EU GDPR and the UK GDPR, which means that the privacy protections provided by New Zealand law have been assessed as providing 'adequate' protections for personal information that is transferred to New Zealand.

Wherever your personal information is transferred, stored, or processed by us, we will take reasonable steps to safeguard the privacy and security of your personal information (which may include implementing standard contractual clauses with third parties we share your information with).

12 Sharing your information

We only share your personal information as described in this Privacy Statement or as otherwise permitted by applicable privacy law. In particular, we may share your personal information with:

- a digital marketing providers, such as [SQC Digital](#), to help us market our services;
- b analytics providers, such as [PostHog](#), to help us understand user behaviour and traffic sources;
- c database and CRM providers, such as [HubSpot](#), to help us manage customer and contact information;
- d other service providers, such as [Google reCAPTCHA](#), and providers that assist with hosting, processing, software development, and communications;
- e our professional advisors, contractors, and business associates who have agreed to handle your personal information in accordance with this Privacy Statement;
- f our related companies, for the purposes described in this Privacy Statement;
- g any person considering acquiring an interest in our business or assets;
- h regulators, law enforcement bodies, government agencies, courts or other third parties where we think it is necessary to share your information to comply with applicable laws, regulations, orders, or to exercise, establish, or defend our legal rights;
- i other people with whom you have permitted, or Your Organisation has permitted on your behalf, us to share your information; and
- j any other person where we are permitted or required to do so by applicable law.

We will not share your personal information with any other person for that person to use for their own purposes, unless we are permitted or required to do so by applicable law.

13 Mosaicq's AI feature

Some Mosaicq products include an AI-assisted feature called Ask Mosaicq that allows you to ask questions about your organisation's data. When you use this feature, any personal information you put into Ask Mosaicq will be processed using Anthropic's Claude model,

accessed through Amazon Bedrock and run entirely within our Amazon Web Services environment.

Your data will never be made available to Anthropic or any AI model that replaces Anthropic or be used to train any AI model. Responses from AI models will be generated automatically and may be incomplete or inaccurate, so you should verify them before relying on them. We do not use these features to make decisions about individuals.

We may monitor your use of Ask Mosaiq, including the queries you submit, to help detect and prevent misuse of the feature.

14 How we protect your personal information

The security and integrity of your personal information is important to us. We have implemented technical, administrative, and physical security measures designed to protect your personal information from unauthorised access, disclosure, use, and modification. These measures are reviewed and updated on an ongoing basis.

15 Your rights

You have the right to request access to, and correction of, the personal information that we hold about you.

In addition to the other rights granted to you, if the EU GDPR or the UK GDPR applies to our collection of personal information from you, then you have the right to:

- a obtain the rectification of inaccurate personal information concerning you and, taking into account the purposes of our processing, the completion of any incomplete personal information;
- b receive access to your personal information that you have provided to us in a commonly-used machine-readable format;
- c restrict processing of your personal information if a basis for doing so exists under the EU GDPR or the UK GDPR;
- d have any personal information about you erased upon request if it is no longer relevant (the 'right to be forgotten');
- e not be subject to a decision based solely on automated processing, including profiling;
- f withdraw your consent to the processing of your personal information, where such consent forms the basis for the processing;
- g lodge a complaint with the appropriate data protection authority.

To exercise your rights, please contact us using the details set out in paragraph 19 below.

16 Retention period

We will retain your personal information for the length of time necessary to fulfil the purposes described in this Privacy Statement, unless a longer retention period is required or permitted by applicable privacy law.

17 Keeping us updated

It is important to us that the personal information we hold about you is accurate and complete. Please let us know as soon as possible if you think we may need to make changes to that information.

18 Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time by publishing an updated version on our website. We encourage you to check this page periodically for any updates.

19 How to contact us

If you would like to exercise your rights, or otherwise contact us about our privacy practices, please contact our Privacy Officer:

By email: info@mosaiq.co

By post: Attention: Privacy Officer
Snapper Services Limited
PO Box 11454
Manners Street
Wellington 6142
New Zealand