

## SNAPPER SERVICES PRIVACY POLICY

Revision Date: [23/02/2021]

1. **Scope:** The Website, Online Accounts, Snapper Apps, Snapper Cards (“**Cards**”), and Card system, are operated by Snapper Services Limited (“**we**”, “**us**”, “**our**”). This privacy policy (“**Privacy Policy**”) forms part of (and must be read in conjunction with) the Snapper Terms of Use (“**Terms**”). Where a definition is set out anywhere in the Terms, that definition shall apply to this Privacy Policy unless the context otherwise requires. This Privacy Policy applies to all information that we collect about identifiable individuals (“**you**”, “**your**”).
2. **Your Privacy:** We are committed to protecting your privacy, and all personal information that you supply to us will be treated in accordance with the Privacy Act 2020 (“**Privacy Act**”). This Privacy Policy explains how we may collect, store, use, and disclose the personal information provided by you.
3. **Collection of personal information:** You may voluntarily provide us with your personal information to enable us to provide you with information or services, respond to your enquiries, carry out a transaction that you have requested, or otherwise use that information in accordance with this Privacy Policy.  
We may also use automated tools, methods, and systems to collect certain information about you automatically when you use the Card, your Online Account, the Snapper Apps or the Website. We may collect personal information as follows:
  - 3.1 **Card ordering – General:** When you order a Card from us, either on the Website or via the Snapper Apps, we will collect personal information from you, including:
    - (a) your name, delivery address, and phone number for the purposes of ensuring that you receive the Card;
    - (b) payment details and preferences, for example, credit card details, so that we can charge you for ordering the Card. If you choose to input your credit card or debit card details into your Online Account or the Snapper Apps, those details will be handled using a secure protocol managed by a third-party secure payment gateway. We will not have access to your credit card details, even if you choose to store those details via the secure protocol.
  - 3.2 **Online Accounts:** When you register your Card to your Online Account, we will collect the following additional information from you:
    - (a) your full name, mobile number and email address;
    - (b) whether you wish to receive marketing materials from us or third parties;
    - (c) For Registered Cards, the information that we collect when that Registered Card is used will be associated with your Online Account and any personal information that you supply to us. This will enable us to identify you and to communicate with you in respect of your Online Account and your Registered Card.
  - 3.3 **Card ordering – Personalised Cards:** When you order a Personalised Card from us, we will collect the following additional information from you:

- (a) your date of birth;
- (b) any relevant licences or endorsements you hold;
- (c) other attributes relevant for identification purposes (for example, which school or university you attend),

all of which will enable us to verify your identity.

**3.4 Card ordering – Concession Cards:** When you order a Concession Card from us, we will collect the following additional information from you:

- (a) evidence of your eligibility to receive a Concession Card (for example, proof of date of birth);
- (b) any additional information which we may collect from you in the future to help us provide services to you.

**3.5 Set up an Online Account:** When you set up an Online Account, we will collect personal information from you, including your first name and last name, email address and password. We will also collect information concerning whether or not you consent to receive marketing materials from us or third parties. We may in future collect additional information to help us to provide services to you.

**3.6 Card use: General:** The information that we collect when you use your Card is anonymous and will not enable us to identify you as the holder of that Card unless your card is a Registered Card.

**3.7 Card use: Adding Stored Value and Travel Passes:** When you order Stored Value or Travel Passes for a Card, or incur Debited Trips we may collect information about that transaction including:

- (a) date, time, and location of purchase;
- (b) nature and value of any Stored Value, and Travel Passes purchased;
- (c) Authorised Merchant's name and other Authorised Merchant details;
- (d) when you order Stored Value or Time Passes, or incur a Debited Trip, the payment details (for example, credit card or direct debit details),

all of which will enable us to process the transaction, to credit or debit your Card as the case may be, to trace any payments made using the Card, and to answer any queries you or an Authorised Merchant may have about the transaction.

**3.8 Card use: Transport services:** When you use a Card for a transport service with a Transport Service Provider, we may collect information about the service you used, including:

- (a) date, time, and duration of your service, journey or Completed Trip;
- (b) nature and value of your service or journey (for example, route and fare information);
- (c) payment method used (for example, Stored Value, a Debited Trip or a Travel Pass);
- (d) Transport Service Provider's name and other Transport Service Provider details,

all of which may be passed on to the Transport Service Provider on an anonymous, aggregated basis, in order for the Transport Service Provider to monitor the usage of transport services provided by that Transport Service Provider, or for other statistical purposes.

3.9 **Card use: Identification:** When you use your Personalised Card as a form of identification, we may collect additional information about you, which may include:

- (a) your date of birth;
- (b) any relevant licences or endorsements that you hold;
- (c) other attributes relevant for identification purposes (for example, which school or university you attend),

all of which will enable us to verify your identity.

3.10 **Card use: Access control:** When you use your Personalised Card in order to gain access to designated buildings and facilities with Snapper-compatible security and electronic access technology, we may collect additional information about you, which may include:

- (a) a list of the buildings and facilities you are entitled to access;
- (b) the reason for your access (for example, your employer's name and your position);
- (c) the frequency and manner in which your Card is used to access the relevant buildings and facilities (including entry and exit times);
- (d) any other information that the entity giving you access requires us to collect,

all of which will enable us to verify your identity and your access rights.

3.11 **Card use: Ticketing and event access:** When you use a Card to purchase tickets for an event, and to enter the event venue at Snapper-compatible events, we may collect additional information about you, which may including:

- (a) date, time, location, and value of the ticket purchase;
- (b) ticket and event details;
- (c) the Authorised Merchant's name and other details;
- (d) the frequency and manner in which your Card is used in relation to that event (including recording your entry and exit at the event venue),

which will enable us to verify that your Card enables you to have access to the event and which will enable us, if you consent to receive our marketing material, to send you marketing material that we consider may be of interest to you.

3.12 **Website, Snapper Apps and Online Accounts:** When you use the Website, Snapper Apps or your Online Account, we may collect personal information about you, including:

- (a) in relation to the Online Account: your email address, full name, mobile number, Card number, challenge question and answer to the challenge question (so we can verify your identity);
- (b) IP address and host name used by your computer to connect to the Website;

- (c) operating system and the browser your computer uses;
- (d) search engine or inbound hyperlink you used to reach the Website;
- (e) pages viewed by you on our Website;
- (f) updated personal information (where you supply this via your Online Account);
- (g) your name and contact details (where you contact us via the Website);
- (h) date, time, and duration of your visit,

which will enable us to verify your identity, and that you are permitted to use the Website, Snapper Apps and Online Account that you wish to access. We will also use that information for our statistical purposes.

**3.13 Support centre:** When you contact our support centre by phone or email, we may collect personal information about you, including:

- (a) in relation to the Online Account: your email address, full name, mobile number, Card number, challenge question and answer to the challenge question (so we can verify your identity); and
- (b) any other relevant contact details you disclose to us in your correspondence.

**3.14 Security and fraud prevention:** We may gather more extensive information for security and fraud prevention purposes, for example if we have concerns about abnormal usage patterns, or possible security breaches, or fraud.

**4. Credit or debit card details:** When you provide your credit card or debit card details to us, we will use those details only to verify and process payments you request. These details are stored securely in a tokenised form with a third-party payment gateway provider.

**5. Providing Information about others:** Where you provide us with personal information about another person (“**Third Party Information**”) – for example, when you order a Card for an employee, friend, or family member – you must:

- (a) advise that person of this Privacy Policy;
- (b) where possible, have that person provide his or her personal information to us directly; and
- (c) in any event, obtain that person’s permission before supplying his or her personal information to us.

You acknowledge that we will collect, use, store, and disclose that Third Party Information in accordance with this Privacy Policy (as if the Third-Party Information were obtained from that person directly), and you warrant and represent that we are authorised to do so by the person to whom the Third-Party Information relates.

**6. Your right not to provide personal information:** You may decide not to provide your personal information to us. However, if you do not provide your personal information (or if you provide incorrect personal information), we may be unable to provide you with access to certain information, products, or services. For example:

- (a) if you do not create an Online Account, you cannot register your Card; and
- (b) if you do not register your Card, you will not be able to use the Auto Top-up service, view Online Transaction Data, or request a balance transfer if your Card is lost or stolen.

7. **Retention and storage:** We do not hold any personal information collected in relation to your order for a Card (other than a Registered Card) for longer than the time necessary to despatch that Card to you.

With regard to Registered Cards and your Online Account, we will retain all personal information that we collect under this Privacy Policy (on both our active systems and our archive systems) in relation to those Cards and your Online Account, for as long as is necessary for us to carry out the purposes for which such information was collected (including for the purpose of providing services to you).

You can request that your account is closed and all personal information be removed from the system at anytime, although the removal of an account and the required registration information will result in deregistering all cards associated to that account.

The location at which we store your personal information will depend on the nature and purpose of the information and the manner in which you supply it to us. We may use, process, and store your personal information at Level 12, 1 Willis Street, Wellington, New Zealand and at our other offices and storage facilities (whether in New Zealand or overseas).

8. **Our contractors:** We may engage specialised information technology contractors or similarly qualified contractors (who have agreed to deal with your personal information in accordance with this Privacy Policy) to analyse, process, and store your personal information on our behalf (whether in New Zealand or overseas).

9. **Security:** We will ensure that the personal information that you provide us is protected, by such security safeguards as it is reasonable in the circumstances to take, against loss, access, use, modification, disclosure (except with our authority), and other misuse.

In addition, we will ensure that if it is necessary for your personal information to be given to a person in connection with the provision of one of our services, we will do everything reasonable within our powers to prevent the unauthorised use or unauthorised disclosure of the information by that person.

10. **Use:** The personal information we collect will be used to operate the Website, the Snapper Apps, Online Accounts, Card system, to provide other services that you have authorised or requested, and for accounting, operational, statistical, and (with your permission) marketing purposes. We may also use your personal information to:

- (a) verify and process any application forms or transactions requested by you;
- (b) contact you if we have difficulty in processing a payment or transaction on your Registered Card;
- (c) respond to any questions or correspondence from you;

- (d) analyse usage, trends, and statistics for the Website, the Snapper Apps, your Online Account, the Cards, the Card system, and any related services;
- (e) improve the Website, the Snapper Apps, your Online Account, the Cards, the Card system, and any related services;
- (f) carry out internal research and development;
- (g) provide you with information about a service that you are using (including critical updates and announcements);
- (h) eliminate the need for you to enter repeatedly the same information;
- (i) customise the Website and the Snapper Apps to suit your particular preferences and interests;
- (j) enable us to use, process, or analyse that information for a specific purpose;
- (k) verify your identity or to provide you with a replacement password when you forget the password for your Online Account; and
- (l) carry out any other use that is notified to you at the time of collection, or which is otherwise authorised by you.

11. **Disclosure:** We will not otherwise disclose your personal information except:

- (a)
  - disclosure is one of the purposes for which the organisation got the information
  - the person concerned authorises the disclosure
  - the information is to be used in a way that does not identify the person concerned
  - disclosure is necessary to avoid endangering someone's health or safety disclosure is necessary to uphold or enforce the law.
  - under section 92ZZF of the Privacy Act 2020 or as a serious threat exception under the Privacy Act personal information may be released to health authorities.

**Consent to supply of further information and disclosure:** With your consent, we may:

- (b) supply you with further information concerning goods and services that we consider may be of interest to you.

12. **Aggregate information:** We may use and disclose, in aggregate, any personal information that we collect under this Privacy Policy, including information which describes and summarises:

- (a) your characteristics and preferences (including demographic information); and
- (b) the frequency and manner in which you use the Website, Online Accounts, Cards, and any related services.

Personal information used and disclosed under this section will be used and disclosed only in aggregate form (i.e. in a manner that does not identify a particular individual). The recipients of such information (for example, the Transport Service Providers; government departments and agencies; regional, district, and city councils; and other organisations) may retain and use that aggregate information for operational, financial, and planning purposes, including:

- (a) carrying out statistical and other summary analysis of the general behaviour and characteristics of users (for example, travel patterns, spend patterns, peak times, website usage);
- (b) measuring and analysing market performance and dynamics;
- (c) diagnosing and solving marketing, sales, and quality issues;
- (d) identifying and resolving capacity and scheduling issues;
- (e) identifying and capturing growth and marketing opportunities; and
- (f) developing new goods and services, and improving existing ones, to better meet your needs.

13. **Access and Correction:** Where we hold your personal information in such a way that it can readily be identified and retrieved, you are entitled to request access to that information or to obtain our confirmation of whether or not we hold that personal information. It is important to us that the personal information we hold about you is accurate, complete, and current. If you have an Online Account, you may log in to your account and update and correct your personal information. You may also contact our privacy officer to request access to, or correction of, your personal information that we hold. We reserve the right to charge a reasonable fee for the preparation and provision of any information you request under this section.

14. **Unsubscribing:** Where you have requested or authorised us to send you messages (for example, newsletters, alerts, confirmations, and information concerning goods and services which may be of interest to you) you can request us to stop sending you any or all of those messages by taking any one of the following steps:

- (a) using the unsubscribe feature (if present) in any such message;
- (b) if you have an Online Account, logging in to your account and updating the appropriate preferences (if available) for that account; or
- (c) contacting our privacy officer.

Once we have received your request we will, as soon as is practicable, comply with that request.

15. **Cookies and sessions:** The Website and the Snapper Apps may use cookies and sessions to provide you with certain services or functionality. Cookies and sessions may be used to identify you as an individual user of the Website. We use this technology to, amongst other things:

- (a) personalise your visits to the Website and the Snapper Apps;
- (b) enable us to improve the content, reliability and functionality of the Website and the Snapper Apps;
- (c) enable you to use certain services or functionality, such as your Online Account;
- (d) evaluate the effectiveness of the advertising on the Website; and
- (e) track Website usage patterns.

Accepting a cookie will not give us access to any data on your computer other than the data stored in the cookie. Although you may configure your web browser to not accept cookies, you may experience a loss of functionality as a result.

In addition, our Website and the Snapper Apps use third party cookies from Google Analytics for Display Advertisers, including the Google Analytics Demographics and Interest Reporting feature, which gives us insight into behavioural information relating to visitor age, gender and interests on an anonymous and aggregate level. This will help us to understand browsing behaviour to give you a better experience whilst visiting our sites. You can access information about Google's Privacy Policy [here](#).

16. **Third party websites:** The Website may contain hyperlinks to third party websites. We are not responsible for the content of third party websites, or the manner in which those websites collect, store, use, and distribute any personal information you provide. When visiting any third party website from hyperlinks on the Website, we encourage you to review the privacy statement of that website so that you can understand how the personal information you provide will be collected, stored, used and disclosed.
17. **Privacy officer:** If you have any questions about this Privacy Policy or about the personal information that we hold about you (or if you wish to complain about the way we have dealt with your personal information), please contact our privacy officer:

Snapper Services Ltd  
PO Box 11454  
Manners Street  
Wellington 6142  
  
0800 555 345  
[info@snapper.co.nz](mailto:info@snapper.co.nz)

18. **Changes:** We may change or update this Privacy Policy from time to time. When we do so we will also revise the 'last updated' date at the top of the Privacy Policy. We encourage you to review this Privacy Policy from time to time to stay informed about how we deal with your personal information. Your continued use of your Card or our Services constitutes your agreement to this Privacy Policy and any updates posted on this Website from time to time.