

Version Table



LATITUDE TECHNOLOGIES LIMITED
Privacy Policy

VERSION TABLE.	
Version	1.0
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Reason for Review	Introduction
Senior Management Sign-off	Yes – Leigh Flounders

Table of Contents

Version Table 1

Introduction..... 2

What Information does Latitude Collect and Hold 3

Overseas Disclosure..... 5

Rights of Access and Correction 6

Storage and Security of Information..... 7

Customer Questions and Complaints..... 8

Changes to Privacy Policy 9

Introduction

This policy sets out how Latitude Technologies Limited (Latitude) collects, uses, manages and stores personal information in accordance with the Privacy Principles contained in the Privacy Act 1993.

What Information does Latitude Collect and Hold

Personal Information

Latitude will collect and hold personal information:

- Provided by customers when customers make or receive payments using Latitude's payment solutions technology (payment platform);
- From third parties, such as identity verification service providers; and
- Through Latitude's transaction activities through its payment platform.

Use of Personal Information

Latitude may use this information to assist in conducting the payment platform service, including (without limitation):

- To deliver information and services to the customer;
- For internal research purposes;
- To verify the customer's identity;
- For promoting and marketing Registered Merchants;
- Communicating with third party service providers who assist Latitude with functions such as fraud prevention and technology services;
- To fulfil Latitude's legal and regulatory requirements (including obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009); and
- For any other use that customers' authorise.

Latitude may also use personal information to promote and market related products and services.

Collection of Information

Latitude will usually collect information directly from customers however Latitude may collect information from other sources where customers have authorised Latitude to do so or where it is unreasonable or impractical to collect the information directly from you.

Customers that Fail to Provide Personal Information

Customers may choose not to provide personal information to Latitude, however this may result in the customer being unable to use the payment platform.

Use and Disclosure of Personal Information

Customers may choose not to provide personal information to Latitude, however this may result in the customer being unable to use the payment platform.

Use of personal information

Latitude may use the personal information for the stated purposes set out above.

Promotional and marketing communications

In relation to promotional and marketing communications, Latitude will always provide the customer with a simple means of opting out of receiving such information (for example, by clicking “unsubscribe” in email communications from Latitude), or the customer can contact Latitude directly.

Disclosure of personal information

Latitude may disclose personal information to third parties:

- To verify the information provided to Latitude in customer registration application;
- If Latitude is required or authorised by law to disclose the information;
- Where it is necessary to facilitate any sale of the payment platform business;
- To promote and market related products and services to customers; or
- If authorised by the customer.

Customers can, by contacting Latitude, instruct Latitude not to disclose their personal information to third parties in relation to promoting and marketing related products and services.

Latitude is prohibited from selling personal information to third parties.

Latitude may disclose customer information to related companies.

Overseas Disclosure

If the customer is a Chinese National to receive payments for goods and services from a Chinese National, their personal information may be disclosed by Latitude to overseas recipients, being third party service providers or regulatory agencies in China who assist Latitude with meeting its regulatory obligations in New Zealand and China.

China may have less strict privacy laws than those contained in the Privacy Act 1993. Latitude is unable to guarantee that an overseas recipient will not breach the Privacy Principles and are not accountable under the Privacy Act 1993 for any breach by an overseas recipient.

If a customer does not want their personal information to be disclosed overseas, they may contact Latitude.

If a customer requests that their personal information not be disclosed overseas, this may impact on their ability to use the payment platform.

Rights of Access and Correction

Right of Access

Customers can access and request the correction of any of their personal information at any time. They may also request that Latitude delete their personal information, however this may impact on their ability to use the payment platform.

Exceptions

A customer's right to access and correct their information is subject to the exceptions contained in the Privacy Act 1993.

Storage and Security of Information

Security measures

Latitude takes reasonable measures to protect all personal information and to ensure personal information may only be accessed by authorised persons.

Cookies

Latitude uses technology called cookies when customers use the payment platform. A cookie is a piece of information that Latitude's web server will send to the customer's computer. The cookie is stored on the customer's hard drive or in memory but it does not give Latitude information about the computer. Latitude uses cookies to learn more about the way customers use the payment platform and to help Latitude improve the customer's use of the payment platform and our website.

The customer is able to configure their web browser to accept or reject all cookies, or to provide notification when a cookie is sent.

Use of the payment platform requires the customer to have cookies enabled in their web browser.

If the customer disables the use of cookies on their web browser or removes or rejects specific cookies from the Latitude website, then they will not be able to use the payment platform.

Deletion of Information

If Latitude no longer needs to hold the customer's personal information for the purposes for which it was collected, and no applicable law requires Latitude to retain that information, Latitude will take reasonable steps to securely destroy and dispose of personal information.

Customer Questions and Complaints

Complaints to Latitude

Customers are invited to contact Latitude in relation to Latitude's customer privacy policy or to make a complaint about Latitude's compliance with the Privacy Principles, by contacting -

Latitude Privacy Officer

Email: privacy@latipay.co.nz

Address: Level 2, 8, Auckland 1010

Phone: +64 22 345 7562

Complaints to Privacy Commissioner

If a customer is not happy with Latitude's response to their query or complaint, they may contact the Office of the Privacy Commissioner at www.privacy.org.nz.

Changes to Privacy Policy

Policy may be changed

Latitude may change this Privacy Policy at any time.

Any changes will be effective upon the Chief Risk Officer updating the version number of this policy.