# NEW ZEALAND DIVING LIMITED PRIVACY AND COOKIES POLICY

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#### INTRODUCTION

This privacy policy ("**Privacy Policy**") is incorporated by reference into the New Zealand Diving <u>Terms of Service</u>. The terms "**New Zealand Diving**," "**we**," and "**us**" and any parent, subsidiary or affiliate of any of the forgoing.

#### **PURPOSE OF THIS PRIVACY POLICY**

This Privacy Policy explains how New Zealand Diving may collect and use the personally identifiable information or personal data ("Personal Information") that we obtain through your use of the New Zealand Diving website accessible at <a href="www.nzdiving.co.nz">www.nzdiving.co.nz</a> (the "Site") and New Zealand Diving's online and offline products, courses, workshops, and events, including the cloud-based assessment and learning platform also accessible through the Site (the "Platform") and our class-based instructional products that are delivered through a variety of modalities, both in-person and online (together, the "Services"), and makes you aware of how and why your Personal Information will be used and the rights you have to access and control the use of your Personal Information.

#### **APPLICATION OF THIS PRIVACY POLICY**

By engaging with the Site and Services, you acknowledge that you have read and understood this Privacy Policy.

For users based in the EU and the UK, we are required to describe our role and our responsibility for Personal Information.

- If you access and use the Site and/or the Services in your individual capacity, we are the "data controller" under EU privacy law.
- If you access and use the Platform or any of the other Services in connection with an Enterprise Agreement entered into between your employer or prospective employer and New Zealand Diving, and in accordance with that agreement, your employer or prospective employer remains data controller for certain Personal Information you may be required to disclose in connection with your use of the Platform or other Services, the terms of that Enterprise Agreement shall apply with respect to the processing of the Personal Information set forth therein. In these instances, we act as a "data processor" under EU privacy law, meaning that we process your Personal Information to provide a service to your employer and do so at their direction. If you have any questions about specific privacy practices in connection with your use of the Platform or other Services through your employer or prospective employer, please contact your employer or prospective employer.
- If you access and use the Platform or other Services in connection with an Enterprise Agreement entered into between your employer or prospective employer and New Zealand Diving, or any parent, subsidiary or affiliate thereof, and in accordance with that agreement, your employer or prospective employer is not designated as the data controller with respect to any of your Personal Information, then New Zealand Diving will be the data controller.

By using the Site or the Services, you are authorizing us to gather and retain data related to the provision of the Site and Services in accordance with this Privacy Policy.

## CATEGORIES OF PERSONAL INFORMATION NEW ZEALAND DIVING COLLECTS

Personal Information includes any information about an individual from which that individual can be identified. It does not include data where the identity has been removed (e.g., anonymized or aggregated data).

The categories of Personal Information about you that we may collect, use, store and transfer include the following, some of which constitute Personal Information only when combined with personal identifiers:

**Identity Data:** Information we use to identify you, authenticate you as an authorized user of the Services, communicate with you, and record any transactions you make. This includes first name, maiden name, last name, log in/user ID and password details, marital status, title, data of birth and gender, social security number where required for reporting purposes. Identity data may also include your image if you participate in a course, class, workshop or event that is recorded and you appear in the recording.

Contact Data: Includes billing address, postal address, email address, telephone number and mobile phone number.

**Technical Data:** Includes internet protocol (IP) address, your log in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Site and Services.

Usage Data: Includes information about how you use the Site and Services.

Transaction Data: Includes details of the Services for which you have previously registered and/or in which you have been enrolled.

**Financial Data:** In limited circumstances, we may collect payment information for processing of payments, but this information generally is collected and processed directly by our payment services providers.

**Assessment Data:** Information on your aptitude in certain technology-based subject areas and your performance on New Zealand Diving's capabilities and learning needs assessments.

**Profile Data:** Includes your interests, preferences, website browsing history, demographic information such as age, gender, education level, feedback and survey responses.

Marketing and Communications Data: Includes your preferences with respect to receiving marketing from us and/or our third-party partners and your communication preferences.

# AGGREGATED AND ANONYMIZED, NON-IDENTIFIABLE DATA

We also collect, use and share aggregated and anonymous data such as statistical or demographic data for a variety of purposes. We may use this type of data to analyze trends with respect to skills, jobs, employment and the workforce generally; to administer, analyze and improve the content and functionality of the Site and Services; for marketing; and to gather demographic information about our user base as a whole. We utilize unstructured machine learning technologies to understand user behaviors and to provide user-specific recommendations and other personalization of the Site or Services experience.

Aggregated or anonymized data may be derived from your Personal Information but is not considered to be Personal Information under applicable privacy laws as it does not directly or indirectly reveal your identity. However, if we combine or connect aggregated or anonymized data with your Personal Information in such a way that that it can directly or indirectly identify you, we treat the combined data as Personal Information and only use it in accordance with the terms of this Privacy Policy.

We reserve the right to use anonymous or aggregated data for any purpose, including, but not limited to, those set forth above. We may also disclose such anonymous aggregate information to our partners or third-party service providers, excluding any Personal Information, except as otherwise provided in this Privacy Policy.

## HOW NEW ZEALAND DIVING COLLECTS YOUR INFORMATION

#### **Direct Interaction**

We collect your Personal Information when you:

- Create an account on the Site or register to use the Services;
- Register or apply for a Course, Class, Workshop or any other Services on the Site, though any of the Services or via a third-party website;
- Participate in our surveys, promotions and competitions;
- Interact with us on various social media channels such as Facebook, Twitter, LinkedIn, etc.;
- Post information to the Site or Services that includes Personal Information, for example, by posting in a chat room or on a blog post;
- Communicate with us, for example, by submitting queries regarding the Site or the Services, interacting with our customer support, marketing
  or sales teams, or requesting additional information from us, including newsletters or other marketing materials; and
- Sign up, in person or online, for events or programs that are run by us or by the third party organizations that we partner with.

# **Automated Technologies or Interactions**

As you interact with our Site and/or Services, we also collect technical data such as anonymous usage statistics about your equipment, browsing actions and patterns. We collect this information by using cookies, server logs, and other similar technology. See below for more information on our use of cookies.

# COOKIES, AUTOMATIC DATA COLLECTION AND RELATED TECHNOLOGIES

When you visit the Site or use the Services, we and our third-party service providers, which may include third-party analytics service providers and third-party advertisers, may use cookies, server logs and other similar technology to collect and store your preferences, usage statistics, website traffic and performance data, as well as other information such as your IP address, the type of Internet browser or device you use, any website you have come to the Site or Services from and your operating system. We may also receive Personal Information about you from various third parties and public sources.

Cookies are small text files that include a unique reference code placed on a visitors' device to store their preferences and sometimes track information. A number of cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to our Site or Services and will last for longer. Some cookies are necessary to enable you to move around the Site and use the Services such as accessing the secure areas of the Site, and they enable us to provide you with the Services you have requested. "Performance cookies" collect aggregated, anonymous, statistical information on how visitors use our Site and Services. We use this information to make improvements to the Site and our Services and to enhance your overall experience. Other cookies, called "functionality cookies," allow the Site and Services to remember choices you make such as your user name when you log in to your account or the language or region you are in. They may also be used to help you watch a video or comment on a blog and are intended to improve your online experience.

We and our third-party vendors and service providers, including Google, use first-party cookies and third-party cookies to gather information about the pages visited through our advertising partners, both on our Site as well as other websites that you visit, so as to place you in a "market segment." This information is then used by us and our third-party vendors and service providers to serve interest-based

advertisements when you visit our Site and other websites and our third party vendors and service providers will combine it with other information from your visits to other websites and apps to learn more about your interests. For more information about this type of interest based advertising, and about how to opt-out of the automated collection of information by third-party ad networks, please visit the consumer opt-out page for the Self-Regulatory Principles for Online Behavioral Advertising at <a href="http://www.aboutads.info/choices/">http://www.aboutads.info/choices/</a>. Without these cookies, advertisements you encounter will be less relevant to you and to your interests.

We also use Google Analytics Advertising Features including Google Analytics Remarketing to advertise across websites, Demographics and Interest Reporting and AdWords and AdSense integrations to collect data about our Site traffic via advertising cookies and anonymous identifiers. We do not facilitate the merging of personal information with non-personally identifiable information previously collected through any Google advertising product. Google may serve ads across other websites that you visit based upon your past visits to our Site, and may also serve our advertisements on other websites. Site visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ad Settings found at <a href="https://www.google.com/settings/u/0/ads?hl=en">https://www.google.com/settings/u/0/ads?hl=en</a>. You can also opt-out of Google Analytics tracking with the Google Analytics opt-out browser add-on found at <a href="https://tools.google.com/dlpage/gaoptout/">https://tools.google.com/dlpage/gaoptout/</a>.

A complete list of our cookies is accessible at <a href="https://generalassemb.ly/rolling-cookies-policy">https://generalassemb.ly/rolling-cookies-policy</a>.

In addition to cookies, we use the following similar technologies:

- Pixel Gifs/web beacons: These are small image files that may be placed by us or third parties on the Site or Services, or within the body of our newsletters so we or third parties can understand which parts of the Site and Services are visited or whether particular content is of interest.
- Flash cookies: We do not serve Flash cookies but Adobe Flash Player may be used by third parties serving advertisements to the Site in cases where these advertisements are served with flash related content. It is not possible to block or restrict or block flash cookies using your browser setting, however information on how to do this is available from the Adobe website at: <a href="http://www.adobe.com/products/flashplayer/security">http://www.adobe.com/products/flashplayer/security</a>.

# **Disabling Cookies**

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can use your browser to notify you each time a cookie is set or to block and delete cookies from your browser. The effect of disabling cookies depends on which cookies you disable but, please note that if you do that, the Site and Services may not work properly and you may not be able to take full advantage of the Site or our Services. You can learn more about cookies by visiting <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a> which includes additional useful information on cookies and how to block cookies using different types of browsers.

Details on how to review your cookie settings and disable cookies on the most popular browsers are set forth below:

# Microsoft Internet Explorer:

- From the menu bar, choose "Tools" then "Internet Options"
- Click on the "Privacy" tab
- Select the appropriate settings

# Google Chrome:

- From the menu bar, choose "Chrome" then "Preferences"
- On the "Settings" page, scroll down and click "Advanced"
- Under "Privacy and Security," click "Content settings" then "Cookies"
- Select the appropriate settings

# Safari:

- From the menu bar, choose "Chrome" then "Preferences"
- From the "Preferences" box, choose the "Privacy" tab in the menu bar
- Select the appropriate settings in the "Website tracking" menu
- Click on "Manage Website Data" and make the appropriate selections

## Mozilla Fox:

- From the menu bar, choose "Firefox" then "Preferences"
- Click on the "Privacy" tab on the menu bar
- Select the appropriate settings in the "Tracking" menu
- Click on "remove individual cookies" and make the appropriate selections

# PURPOSES FOR WHICH NEW ZEALAND DIVING USES YOUR INFORMATION

We have set forth below the ways in which we may use your Personal Information, along with the legal bases and legitimate business interests on which we rely to do so where appropriate.

Please note that we may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your Personal Information. Where more than one ground has been set out in the table below Please contact us if you need more information about the specific legal ground on which we are relying to process your Personal Information:

Purpose/Activity	Type of Data	Lawful Basis for Processing
To identify you and your account and to enable you to register to use the	Identity Data	Necessary (i) to allow you to access the Services, (ii) for the performance
Services.	Contact Data	of a contract with you and (ii) for our
	Assessment Data	legitimate business interest in being
		able to provide the Services to you.
To manage and process payments,	Identity Data	Necessary for our legitimate business
fees and charges for the Services.	Contact Data	interest to obtain a payment due to us for Services.
= 6 1111 11 11 11	Financial Data	
To facilitate and deliver the Services.	Identity Data	Necessary (i) to provide the Services to you, (ii) for the performance of a
	Contact Data	contract with you and (ii) for our
	Assessment Data	legitimate business interest in being
		able to provide the Services to you.
To manage our relationship with you,	Identity data	Necessary (i) for the performance of a
including:	Contact Data	contract with you, (ii) for our legitimate business interest in being
	Profile Data	able to provide the Services to you,
	Usage Data	and (iii) to provide an excellent
		customer experience to you during
Net's decreased and a second		the course of the Services.
Notifying you about any changes to our Services, timetables for the	Identity Data	Necessary (i) for the performance of a contract with you, (ii) for our
Services, requirements for the	Contact Data Profile Data	legitimate business interest in being
Services, and any technical	Profile Data	able to provide the Services to you,
requirements.		and (iii) to provide an excellent
		customer experience to you during the course of the Services.
Providing you with feedback on your	Identity data	Necessary (i) for the performance of a
participation and performance in the	Contact data	contract with you, (ii) for our
Services.	Profiles Data	legitimate business interest in being
	Usage Data	able to provide the Services to you,
	Assessment data	and (iii) to provide an excellent customer experience to you during
		the course of the Services.
Reviewing and scoring your	Identity data	Necessary (i) for the performance of a
Assessments and coursework and	Contact data	contract with you, (ii) for our
certifying your completion of the relevant Services.	Assessment data	legitimate business interest in being
relevant Services.		able to provide the Services to you, and (iii) to provide an excellent
		customer experience to you during
		the course of the Services.
Notifying you of any changes to this	Identity data	Necessary for our compliance with
or any other policy.	Contact data	our legal obligations under applicable data privacy laws.
Asking you to complete a review or	Identity data	Necessary for our legitimate business
take a survey.	Contact data	interests (i) in keeping our records
	Marketing and communications data	updated, (ii) understanding how
	and sommented add	customers use and rate our Services,
		(iii) providing you an excellent customer experience during the
		course of the Services, and (iv)
		ensuring we constantly improve our
		Services to meet the needs and
Towards a CO LO		demands of our clients and students.
To provide our Site and its content to you and to enhance users'	Identity data	Necessary for our legitimate business interest in being able to provide the
experience.	Technical data	Site and Services to you and to
,	Profile Data	111111111111111111111111111111111111111

	Usage Data	improve the Site and Services to best meet your needs and use.
To improve the functionality of the Site or Services and to provide related customer service.	Identity Data Contact Data Profile Data Technical Data Usage Data	Necessary (i) for the performance of a contract with you and (ii) for our legitimate business interests in (a) being able to provide the Services to you, (b) providing administration and IT services and network security in connection with the services, (c) providing you an excellent customer experience during the course of the Services, and (d) ensuring we constantly improve our Services to meet the needs and demands of our clients and students.
To administer and protect the Site and Services (including troubleshooting, data analysis, testing, system review).	Identity Data Contact Data Profile Data Technical Data Usage Data	Necessary (i) for the performance of a contract with you and (ii) for our legitimate business interests in (a) being able to provide the Services to you, (b) providing administration and IT services and network security in connection with the services, (c) providing you an excellent customer experience during the course of the Services, and (d) ensuring we constantly improve our Services to meet the needs and demands of our clients and students.
To respond to your communications and to send you information that you request or agree to receive, via regular or electronic mail, text message, or other marketing channels.	Identity Data Contact Data Technical Data Usage Data Profile Data Marketing and Communications Data	Necessary (i) for the performance of a contract with you and (ii) for our legitimate business interests in continuing to develop and offer new and improved Services to you and in continuing to grow our business.
To make suggestions and recommendations to you about other courses and services that may be of interest to you.	Identity Data Contact Data Technical Data Usage Data Profile Data Marketing and Communications Data	Necessary for our legitimate business interests in continuing to develop and offer new and improved Services to you and in continuing to grow our business.
To allow you to partake in a competition or promotion.	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data	Necessary for our legitimate business interest in encouraging users to visit the Site and use the Services and in the general promotion of our business.
To send you advertisements or other marketing materials via email, text message or other marketing channels about other programs, promotions or services (or those of our affiliates), including our newsletter, that we think may be of interest to you if you have requested or agreed to receive such information, or where we are otherwise permitted by local law to contact you for these purposes.	Identity Data Contact Data Technical Data Usage Data Profile Data Marketing and Communications Data	Necessary for our legitimate business interests in continuing to develop and offer new and improved Services to you and in continuing to grow our business.

# CHANGE OF PURPOSE

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation as to how the new purpose is compatible with the original purpose, please contact us at <a href="mailto:dive@nzdiving.co.nz">dive@nzdiving.co.nz</a>. If we need to use your Personal Information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do this.

#### **NOTICE TO JOB APPLICANTS**

When you apply for a job posted on our Site, we may collect the Personal Information that you voluntarily submit to us, including, but not limited to: name, personal email address, telephone number, postal address, education, employment history and any other information included in a resume, cover letter or personal LinkedIn profile, gender, race or ethnic origin, veteran status, disability status and information relating to references. We do not require your details of race or ethnic origin or your disability status and it will not affect your application in any way if you do not provide such information. Where you do provide such information, we will use that information only as permitted by law for the purposes of diversity and equal opportunity monitoring. If you provide us with the details of a reference as part of your resume, it is your responsibility to obtain such third party's consent prior to submitting their information to us. The personal information that you submit in connection with a job application will be used by New Zealand Diving in accordance with this Privacy Policy and may be used for the following purposes: to evaluate your capabilities and qualifications for a job; to conduct reference checks; and to clear conflicts of interest and conduct background checks, if applicable and where applicable law allows. If you become an employee or contractor, any Personal Information you submit will become a part of your file and may be used for other employment/work related purposes.

# **HOW TO OPT OUT OF FUTURE COMMUNICATIONS**

If you do not want us to contact you with marketing communications or other information regarding our products and services (or if you agreed to be contacted for such purposes at the point Personal Information was collected by us but you no longer wish to be contacted or have your information used in such way), you can let us know by following the unsubscribe instructions on any communications sent to you. You can also unsubscribe at any time by contacting us at <a href="mailto:dive@nzdiving.co.nz">dive@nzdiving.co.nz</a>.

Please note that if you have registered an account on the Site or Services or are registered for

a Course, opting out of receiving marketing messages will not apply to Personal Information provided to us as a result of signing up to use our Site or Services, and we reserve the right to send you certain communications relating to your account, your registration, and your use of the Site and Services, such as messages relating to account management, customer service and system maintenance. These transactional account messages will thus be unaffected if you choose to opt-out of marketing communications.

## HOW NEW ZEALAND DIVING MAY SHARE YOUR INFORMATION

Vendors and Third-Party Service Providers. We may share any information we receive, including your Personal Information, with third-party vendors or service providers, including Instructors, retained in connection with the provision of the Site or Services. This includes, but is not limited to, those providing website and data hosting services, distributing communications and supporting or updating marketing lists, facilitating feedback on our services (e.g., Survey Monkey); and providing IT support services from time to time. These organizations (which may include third-party suppliers, agents, subcontractors, and/or other affiliates) will only use your information to the extent necessary to perform their support functions. In addition, where necessary, we have entered into Data Processing Agreements or service provider agreements with these third-party service providers, which require the service providers to both keep that information confidential and not use it for any purpose except to the extent necessary to perform their support functions.

Payment Transactions. All payment transactions are conducted through our PCI compliant secure payment solutions provider Braintree, a division of PayPal, Inc. For additional information on how Braintree secures your payment card information during transmission and storage, please refer to Braintree's privacy policy located at: <a href="https://www.paypal.com/us/webapps/mpp/ua/privacy-full">https://www.paypal.com/us/webapps/mpp/ua/privacy-full</a>. You will be providing debit or credit card information directly to our payment solutions provider that operates a secure server to process payment details, encrypting your credit/debit card information and authorizing payment. Information that you supply to our payment solutions provider is not stored by us or within our control, and is subject to our payment solutions provider's own privacy policy and terms and conditions.

**Events and Partnerships.** From time to time, we may partner with other organizations to run events. If you register for an event on our Site and we indicate on our Site that the event is in partnership with or sponsored by another organization, in circumstances where either you agreed to be contacted by marketing communications at the time we collected your information or where we are otherwise permitted by local law to contact you for marketing purposes, your email address may be available to that organization and you may receive emails from them after the event. Please refer to that organization's privacy policy for information on how to opt-out of their communications should you receive an email from them but no longer wish to be contacted by them.

Displaying to Other Users. Some content that you post to the Site or Services may be displayed publicly. Other users of the Site or Services may be able to see some information about you, such as information contained in comments posted in a chat room or on a blog post. You should exercise caution when using public forums. We discourage the posting of sensitive or Personal Information in comments or posts to the Site and/or Services and we are not responsible for the use of any Personal Information by third parties that you publicly post on the Site or Services. If you participate in a course, class, workshop or event that is recorded and you appear in the recording, your image may be visible to other participants of that course, class, workshop or event.

**Social Networking and Other Websites**. The Site or Services may allow you to post information to social networking websites. We do not share your information with such social networking website unless you direct the Site or Services to share it. The use of the information by such social networking websites will be governed by their privacy policies, and we do not control their use of the shared data.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your Personal Information, other account information, usage information and device identifier (including IP address), and content if we believe doing so is required or appropriate to: comply with

law enforcement requests and legal process, such as a court order, warrant or subpoena; respond to your requests; enforce our policies related to our Site or Services, or other applicable policies; or protect your, our, or others' rights, property, or safety. Unless prohibited by law or court order, or unless we determine in our sole discretion that notification is inappropriate under the circumstances, we will take all reasonable steps to notify all affected users of a legal request for information or intended disclosure prior to disclosure.

Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your information, including Personal Information, may be sold or transferred as part of such a transaction as one of the transferred assets as permitted by law and/or contract. We cannot control how such entities may use or disclose such information.

With Your Consent. We may also disclose your information, including your Personal Information, where you have specifically provided your consent for the disclosure. You may withdraw consent to disclosures where you have previously given a specific consent by emailing us at <a href="mailto:dive@nzdiving.co.nz">dive@nzdiving.co.nz</a>

#### SECURITY OF YOUR INFORMATION

We have implemented appropriate physical, technical and administrative measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure. In addition, we limit access to your Personal Information to only those employees, agents, contractors and other third parties who need to have access to such information for the operation of our business, including operation of the Site and Services. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.

As noted above, all payment transactions are conducted through our PCI compliant secure payment solutions provider Braintree, a division of PayPal, Inc. For additional information on how Braintree secures your payment card information during transmission and storage, please refer to Braintree's privacy policy located at: <a href="https://www.paypal.com/us/webapps/mpp/ua/privacy-full">https://www.paypal.com/us/webapps/mpp/ua/privacy-full</a>.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site or the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Site or the Services like message boards. The information you share in public areas may be viewed by any user of the Site or the Services.

Unfortunately, no electronic data transmission or storage of information can be guaranteed to be completely secure or error free and we cannot warrant or guarantee the security of any Personal Information transmitted to our Site or Services. Any transmission of Personal Information is at your own risk.

# **CHILDREN'S PRIVACY**

Our Site and the Services are not intended for nor directed toward children under the age of 16 and we do not knowingly collect personal information from children under 16 years of age. If you believe that your child under the age of 16 may have provided us with Personal Information without your consent, you may alert us at <a href="mailto:dive@nzdiving.co.nz">dive@nzdiving.co.nz</a>. If we learn that we have inadvertently collected any Personal Information from children under 16, we will promptly take steps to delete such information and terminate the child's account.

## **EXTERNAL LINKS**

The Site or Services may, from time to time, contain links to external websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We have no control over these third parties and we are not responsible for the content of such websites or for the privacy policies or practices of such third parties. You should carefully review the privacy policy of any such third party website that you visit.

## **DATA RETENTION**

We will only keep your Personal Information for as long as necessary to fulfill the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your Personal Information are available on request by emailing us at <a href="mailto:dive@nzdiving.co.nz">dive@nzdiving.co.nz</a>.

#### YOUR LEGAL RIGHTS

- To be provided with a copy of your Personal Information held by us;
- To request that we correct any of your Personal Information held by us;
- To request that we restrict the processing of your Personal Information (while we verify or investigate your concerns with this information, for example); and
- To object to any further processing of your Personal Information, including the right to object to marketing;
- To request that the Personal Information you have provided be transferred to a third party;
- · To withdraw consent, without detriment, where the basis of the processing of your Personal Information is based on consent;
- To request that we delete any of your Personal Information held by us, unless a legal exception applies..

You will not have to pay a fee to access your Personal Information (or to exercise any other rights). We may, however, charge a fee if we believe your request is excessive, unfounded or repetitive. Alternatively, we may refuse to comply with your request in these circumstances.

In response to any of the requests outlined above, we may need to request specific information from you to enable us to confirm your identity and to ensure you have the right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that your Personal Information is not disclosed to any person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request in order to speed up our response time.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month 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.

## UPDATE YOUR INFORMATION OR POSE A QUESTION OR SUGGESTION

It is important that the Personal Information we hold about you is accurate and up to date. Please keep us informed if your Personal Information changes during your relationship with us. You can update, correct, or delete any information that you have provided to us through your use of the Site or Services by sending an email to <a href="mailto:dive@nzdiving.co.nz">dive@nzdiving.co.nz</a>.

If you have questions about unsubscribing from email or other communications, you may send an email to dive@nzdiving.co.nz.

Please share any suggestions you may have for improving this Privacy Policy, by sending an email to dive@nzdiving.co.nz.

# **CHANGES TO OUR PRIVACY POLICY AND PRACTICES**

From time to time, we may revise or update our Privacy Policy. We will notify you of any changes by posting updates to the Privacy Policy on this web page. The date the Privacy Policy was last revised is identified at the top of the page.

## **CONTACT INFORMATION**

If you have any further questions about this Privacy Policy or New Zealand Diving's privacy practices, please contact us at the information below:

New Zealand Diving Unit 2, 23 Morrison Drive Warkworth, 0910

 $Email\ address: \underline{dive@nzdiving.co.nz}.$