

PRIVACY POLICY

UPDATED: 20/2/24



1) Our Agreement

1.1 Formation of Agreement

1.1.1 Johnson Technology Ltd ("CloudX", "our, we or us") is committed to protecting your personal information. We have created this Privacy Policy to help you understand how we collect, use, and protect your personal information when you visit our websites and use our products and/or services.

1.1.2 This policy is provided for your information and doesn't limit or exclude rights under the Privacy Act 2020 and the Telecommunications Information Privacy Code 2020

1.2 What information does CloudX collect?

1.2.1 We collect information relating to you that you have provided to us (for example an application for service form.) or that we may have obtained from another source (such as suppliers or marketing organisations and credit agencies). Where possible, we will collect the information directly from you. However, the method of collecting this information may vary depending on which one of our services you are using (for example our internet or our voice services.)

1.2.2 This information may include your name, address, telephone number(s), information on how you use our products and services (like type, date, time, location, and duration of calls, messages or numbers you call, how you spend, and information on you and the browsing and viewing activity that occurs while you use internet services (including the internet sites and pages visited, your Internet protocol (IP) address and the dates and times you or anyone using your internet services logs on and off)), the location of your mobile phone, lifestyle information, and any other information collected in relation to your use of our products and services.

1.2.3 Security cameras operate in our corporate offices and any other controlled by CloudX. Those cameras record video and images of anyone entering those premises.

1.2.4 The information that we collect about you may be held by us while you are using our services and for a period of time afterward, but only for so long as we are legally entitled to use the information in accordance with this Privacy Policy.

1.3 How does CloudX use your information?

1.3.1 The information we collect from you may be used by us for a number of purposes connected with our business such as:

1.3.1.1 Processing your orders or applications

1.3.1.2 Carrying out credit checking and scoring.

1.3.1.3 Providing you with products and/or services you have requested or administering your account.

1.3.1.4 Billing you and collecting any debt owed to us by you.

1.3.1.5 Settling accounts with those who provide related services to us.

1.3.1.6 Dealing with your requests, enquiries, or complaints and other customer support and care-related activities.

1.3.1.7 Carrying out market analysis and improvements to our products and services.

1.3.1.8 Contacting you about our partner's products and services and products and services of third parties that we think may be of interest to you.

1.3.1.9 Registering your details and allocating or offering you rewards, discounts, or other benefits and fulfilling any requests or requirements you may have in respect of our loyalty or reward programs and similar schemes.

1.3.1.10 Carrying out an activity in connection with a legal, governmental, or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.

1.3.1.11 Carrying out activities connected with running of our business such as personnel training, quality control, network monitoring, testing, and maintenance of computers and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or potential customer.

1.3.1.12 Generally customizing your experience with us.

1.3.1.13 For general administrative and business purposes.

1.4 Sharing your information

1.4.1 There may be times when we need to disclose your personal information to third parties (some of which may be based outside New Zealand). If we do this, we will only disclose your information to:

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- 1.4.1.1 Our group of companies who may use and disclose your information for the same purposes as us;
 - 1.4.1.2 Those who provide to us or our group of companies products or services that support the services that we provide, such as our dealers, partners, and suppliers;
 - 1.4.1.3 Other network operators enable you to make and receive calls through other networks, so we can transfer numbers from one network to another and monitor or investigate fraud or other offences;
 - 1.4.1.4 Credit reference agencies, who may share your information with organisations and who may keep a record of the searches we make against your name;
 - 1.4.1.5 Debt collection agencies or companies in order to collect any money owing by you in respect of an unpaid CloudX Invoice;
 - 1.4.1.6 Companies who purchase receivables from us;
 - 1.4.1.7 If someone else pays your bill, such as an employer, that person;
 - 1.4.1.8 Those providing telephone and similar directories or directory enquiry services and other such publicly available databases and publications, except where you have directed us not to;
 - 1.4.1.9 Anyone we transfer our business to in respect of which you are a customer of potential customer;
 - 1.4.1.10 Anyone who assists us in protecting the operation of the CloudX networks and systems, including the use of monitoring and detection in order to identify potential threats, such as hacking virus destruction, and other security vulnerabilities;
 - 1.4.1.11 Anyone who hosts or maintains data centres, service platforms, and other infrastructure and systems on behalf of us and our group companies where your information is processed;
 - 1.4.1.12 Persons to whom we may be required to pass your information by reason of legal, governmental or regulatory authority including law enforcement agencies and emergency services;
 - 1.4.1.13 Other service providers in relation to a service used through our network to allow that service to be charged to you;
 - 1.4.1.14 Aggregated user statistics and other information that does not personally identify you, to third parties such as advertisers, customers, potential customers, and partners.
 - 1.4.1.15 Any person or organisation as authorised by the Privacy Act 2020 and/or the Telecommunications Information Privacy Code 2020, including with your prior authorisation which we will usually obtain at the time of collecting the information from you.
 - 1.4.1.16 Other people whom you specifically request we share your account information with (eg. By 'authorising' them on your account or where you are the bill-payer / person responsible for paying the bill on an account with more than one connection and have not opted out other end users of connections you pay for on the account from receiving bill payment reminders regarding the account.)
 - 1.4.1.17 If you have not opted out of receiving marketing emails from CloudX we may provide your personal information to carefully selected third parties who we reasonably believe provide products and/or services that may be of interest to you and who have an agreement with CloudX to keep the information confidential, or who are subject to obligations to protect your personal information.
 - 1.4.1.18 If you would like to opt out of receiving CloudX marketing content, please call us on **0800 845 562**. After cancelling, CloudX will still send you essential information related to your products, services and account.
- 1.4.2 Protecting your personal information**
- 1.4.2.1 CloudX will take reasonable steps to ensure that your personal information that we collect, use or disclose is accurate, complete and up-to-date and stored in a secure database that is protected from unauthorised access, modification or disclosure.
 - 1.4.2.2 If you choose to restrict your caller ID visibility we will prevent your number being shown on any receiver. Although your number may still be displayed to

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emergency services, when you send a text message and to us. Where you choose not to restrict caller ID visibility, your number may be displayed to the person you have called or sent a text message.

1.4.3 Accessing and updating your personal information.

- 1.4.3.1 You have the right to access personal information about you, if we hold that personal information in a way that can readily retrieved, subject to exceptions provided by law.
- 1.4.3.2 We will not provide personal information if:
 - 1.4.3.2.1 We do not know beyond reasonable doubt that the personal information is about you; or
 - 1.4.3.2.2 If disclosing the information would involve the unwarranted disclosure of affairs of another individual.
- 1.4.3.3 You can request correction or amendment of the information held by us at any time. If it is reasonable circumstances for us to do so, we will make the requested change or correction, otherwise, we'll take reasonable steps to mark the information specified by you as having been subject to a change or correction request.

1.4.4 Internet use

- 1.4.4.1 We make reasonable efforts to maintain the security of our internet connections. However, for reasons outside our control, security risks may still arise. Any personal information transmitted to us or from our online products and/or services will therefore be at your own risk, however, we will use our best efforts to ensure that any such information remains secure. We connect to protect any information that you make available to the public.
- 1.4.4.2 Please note that when you are accessing a non-CloudX website, you should always read their privacy policy or website terms and conditions especially if you are considering providing them with your personal information. You are also responsible for maintaining the secrecy of your password and/or any account information.
- 1.4.4.3 We may use cookies and other interactive techniques to collect non-personal

information about how you interact with our website, and web-related products and services, to:

- 1.4.4.3.1 Understand what you do and don't like and how you use our website;
- 1.4.4.3.2 Provide a more enjoyable, customised service and experience.
- 1.4.4.3.3 Enable you to use certain services on our website; and help us develop and deliver better products and services tailored to our customers' interests and needs.
- 1.4.4.4 We also collect IP addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. We collect and manage IP addresses as part of the service of providing internet session management and for security purposes.
- 1.4.4.5 We may also use cookies to record details such as a unique user identity and general registration details on your PC. This helps us recognise you on frequently recurring visits to our website so that you don't have to re-authenticate each time you visit our website.
- 1.4.4.6 Most browsers allow you to choose whether to accept cookies or not. You can either refuse all cookies or you can set your browser to alert each time a website tries to set a cookie. You do not need to have cookies enabled to access our site, but they may be needed to access certain functionality on our website.

1.4.5 Changes to this policy

- 1.4.5.1 We may change this Privacy Policy from time to time and we will tell you about a change in the policy by posting an updated policy on our website. Any we change we make applies from the date we post it on the website.