



PRIVACY POLICY

Overview

1. **General:** Signal Corporation Limited (**we/us/our**) acknowledges and respects the privacy of individuals. This policy (**Privacy Policy**) sets out:
 - 1.1 how our services may be used;
 - 1.2 how we collect, use, manage and protect personal information;
 - 1.3 your rights in relation to any of your personal information that we hold;
 - 1.3 details of any overseas countries in which your personal information may be stored or processed on our behalf; and
 - 1.4 how to contact us.

Personal information is information about an identified or identifiable individual. If you can't be identified (for example, when personal information is aggregated and anonymized) then the information or data is not personal information.

HOW OUR SERVICES MAY BE USED

2. **Our Services:** We are in the business of dealing with public safety incidents for the safety of the public. We do this through a SaaS enabled platform and a strict set of terms of use that our service users must accept before accessing the Signal services.
3. **Restrictions:** We restrict the use of our Signal services in a way that respects the privacy and rights of others. In particular, users must comply with, all applicable laws, rules and regulations. Without limitation, this includes a prohibition on using the Signal services:
 - 3.1 in a way that violates the privacy, rights or civil liberties of any person (including in a way that prevents the exercise of them);
 - 3.2 for any unlawful purpose, including in the United States of America, surveillance of persons engaged in constitutionally protected activities; and
 - 3.3 to collect personal information about third parties other than as part of the users' legitimate use of the Signal services, including without limitation, e-mail addresses.

OUR COLLECTION OF PERSONAL INFORMATION

General

4. **Privacy Act 2020 and GDPR:** We comply with the [New Zealand Privacy Act 2020](#) and any other privacy laws that we are legally obliged to comply with, including (as applicable), the General Data Protection Regulation (EU) 2016/679 (**EU GDPR**) and/or the United Kingdom Data Protection Regulation (**UK GDPR**).
5. **Subject to Change:** This Privacy Policy is subject to change. Any changes will be effective when a notice of the change is posted on www.getsignal.info/privacy. Please check this Privacy Policy periodically so that you are aware of any changes.

What information do we collect and hold?

6. **Collection of Information:** We may collect and hold personal information:
 - 6.1 **Customer information:** provided when you (in your own right or on behalf of the service user organisation for whom you are acting) sign up to the Signal service and as you use the Signal service and our sites. Examples of Customer Information we may collect and hold includes, without limitation:
 - 6.1.1 your name, address, email address and IP address; and

6.1.2 a log of your interaction with the Signal service and our sites.

- 6.2 **Prospective users:** When you elect to schedule a demo or trial of Signal service we collect your personal information, including your name, company name, email address, phone number, industry category, time zone, and your use of the Signal services during your demo or trial.
- 6.3 **Inadvertent and unavoidable collection:** Signal service users may use Signal services in such a way that the personal information of other persons is collected through the Signal Services (**Third Party Personal Information**).
7. This information is usually collected directly from you but occasionally, where it is unreasonable or impractical to do so, or where it is collected as part of the Signal service as directed by users (as noted above), it may be provided by third party service providers or obtained from publicly available sources. You may choose not to provide any personal information to us, however as a result we may not be able to provide services to you (or the service user organisation for whom you are acting).
8. Where we process or hold personal information solely on behalf of a service user (for example, Third Party Personal Information), we do so as an “agent” under the NZPA and, to the extent applicable, a “data processor” under the EU GDPR and/or UK GDPR. The data controller in this situation (for example, the Customer) will have its own privacy policy that will apply to its use of your Personal Information.
9. Where we process, use or disclose personal information for our own purposes (for example, direct marketing), we will be an “agency” governed by the NZPA and, to the extent applicable, a “data controller” under the EU GDPR and/or the UK GDPR.

How do we use personal information?

10. **Provide services:** We may use the personal information that we gather so that we can:
- 8.1 administer service user accounts;
 - 8.2 deliver the Signal services;
 - 8.3 invoice and charge for the services;
 - 8.4 respond to communications from you;
 - 8.3 defend or enforce any legal claim against us;
 - 8.4 comply with our legal obligations, including any notification and reporting obligations and any access directions imposed on us by a Government agency or regulatory authority, This will include complying with any notification and reporting obligations and any access directions imposed on us by a Government agency, and otherwise where the law requires or allows us to do so; and
 - 8.5 analyse Signal service user behaviour, preferences and intentions for the purpose of:
 - 8.5.1 determining Signal service developments;
 - 8.5.2 delivering a statistical result for the purposes of general announcements;
 - 8.5.3 helping Signal to understanding its market position;
 - 8.5.4 ensuring the security of the Signal's services; and
 - 8.5.5 combating and preventing breaches of our service agreements and this privacy policy.
11. **Direct marketing:** We may use the personal information that we gather for direct marketing purposes, such as sending you offers or information on our services, where we have a strong reason to assume such an offer may be of interest to you (or the organisation for whom you

work). You can opt out of receiving marketing materials by writing to us at the below address or following any instructions to unsubscribe in one of our marketing emails.

Legal basis

10. **Purposes of a contract:** We process personal Information for the purposes of the contract between us and our service users, including: (i) to deliver the Signal services or information to our service users; and (ii) to assist you (or the service user organisation for whom you are acting) with matters relating to the Signal services.
10. **Legitimate interests:** We also process personal information to carry out the legitimate interests pursued by our business, including (without limitation) (i) to improve, and better understand your preferences (ii) to notify you of any change to the Signal service, and (iii) to fulfill our legal, contractual and regulatory obligations, including any notification or reporting obligations and any access directions, imposed on us by any Government agency (if and to the extent necessary). We have assessed that, when processing personal information based on legitimate interests, our interests are not overridden by the interests or fundamental rights and freedoms of the person to whom the personal information relates. However, if you are based in the European Union (including Switzerland) or the United Kingdom at the time we are processing your personal information, you have the right to object to the way we process your personal information where the processing is based on legitimate interests.
11. **Data processing function:** In respect of personal information we process or hold solely on behalf of our service users, we act as an “agent” under the NZPA and, to the extent applicable, a “data processor” under the EU GDPR and/or UK GDPR. The data controller is responsible for determining the legal basis upon which that Third Party Personal Information is processed.

How do we disclose personal information?

12. **Third party providers:** We may use other companies and individuals to perform services on our behalf, or otherwise in connection with the Signal services. They may have access to your personal information as needed to perform and provide these services or otherwise obtain the benefit of the Signal services (as applicable), but we will not authorise them to use your personal information for any purpose that is inconsistent with this Privacy Policy.
13. **Disclosure to third parties:** We may disclose personal information:
 - 13.1 to meet the purpose for which it was gathered;
 - 13.2 for the purpose of processing and delivering a service related request;
 - 13.3 if we are required or authorised by law to disclose the information;
 - 13.4 if we are required to disclose the information under any agreement or arrangements we have with our third party providers or service users;
 - 13.5 to protect and defend our rights or property and those of our third party providers (and, where applicable, their end users); and
 - 13.6 to protect the safety of users of the Signal service or services provided by our third party providers, or the public.
14. **Law enforcement:** We may preserve or disclose your personal information if we believe that it is reasonably necessary to comply with any law, regulation, legal process or governmental request (including any notification or reporting obligations and any access directions) or to address fraud, security or technical issues. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to a third party’s (including any Governmental) request to disclose your information.
15. **Affiliates:** We may disclose this information to our affiliated companies and to any prospective purchasers of us or a substantial portion of our assets.

Trans-border personal information transfers

16. Signal is located in New Zealand, so personal information may be transferred and /or stored there. For the purposes of the EU GDPR and the UK GDPR, New Zealand has been recognized as providing adequate protection.
17. We utilize the services of third party processors (or sub-processors, as applicable) in various countries (including New Zealand and the United States) who may access your personal information for the matters specified under the heading “How do we disclose personal information” above. Consequently, we may transfer personal information to persons or entities located in these countries. Although we will endeavor to ensure that personal information is treated securely and in accordance with this Privacy Policy as well as applicable privacy laws, we advise that some of these countries may not have an equivalent level of data protection laws as those in New Zealand.
18. If we transfer personal information to a third party located in a country outside:
 - 18.1 the European Economic Union that the European Commission has not recognised as providing adequate protection, if required by the EU GDPR we will enter into an agreement with that third party that containing the standard contractual clauses approved by the European Commission; or
 - 18.2 the United Kingdom that the United Kingdom Government has not recognised as providing adequate protection, if required by the UK GDPR we will enter into an International Data Transfer Agreement or Addendum (as appropriate) issued under section 119A of the UK Data Protection Act 2018.

Retention and deletion of personal information

17. We retain personal information for as long as the service user associated with the personal information is active. We take steps to regularly destroy personal information, however we may:
 - 18.1 in some cases, retain a copy of personal information to comply with our legal obligations, resolve disputes, enforce our agreements and to comply with our trust and safety obligations. Personal information retained for this purposes will be archived and stored in a secure manner after the relevant user organisation has stopped using Signal services, and will not be accessed unless required for any of these reasons; and
 - 18.2 retain personal information in an aggregated, de-identified or otherwise anonymous form, such that there is no reliable way of identifying a person from the information.

Your privacy rights

18. **Accuracy:** We will take reasonable steps to ensure that the personal information we collect is accurate, complete and up-to-date.
19. **Your rights:**
 - 19.1 You have the right to access your readily retrievable personal information that we hold about you, and to ask for it to be corrected if you think it is wrong.
 - 19.2 If you are based in the European Union (including Switzerland) or the United Kingdom you also have the right, under the EU GDPR or the UK GDPR (as applicable), to:
 - in certain circumstances, have your personal information erased;
 - restrict the processing of your personal information;
 - move, copy or transfer your personal information easily for your own purposes across different services in a safe and secure way; and
 - object to processing where we rely on our legitimate interests as the lawful basis for processing.
20. **Complaints:** You may also lodge a complaint regarding our personal information processing activities as they relate to your personal information with your relevant privacy law supervisory authority.

21. **Our response:** We will respond to any request made in respect of the above in accordance with the applicable Data Protection Laws where you are resident. Please note that there are some exceptions to your right to gain access to your information, including (but not limited to) where:
- 22.1 providing access would have an unreasonable impact upon the privacy of other individuals;
 - 22.2 the request for access is frivolous or vexatious or is manifestly unfounded or excessive;
 - 22.3 the information relates to existing or anticipated legal proceedings between you and us, and the information would not be accessible by the process of discovery in those proceedings; or
 - 22.4 providing access would be unlawful.

Clickstream data

23. **Automated collection:** Each time you visit our sites or use our services our server collects some anonymous information, known as click-stream data, including the type of browser and system you are using; the address of the site you have come from and move to after your visit; the date and time of your visit; and your IP address.
24. **Aggregate data:** We may collect this information for statistical purposes to find out how our sites and Signal service is used and navigated, including the number of hits, the frequency and duration of visits, most popular session times. We may use this information to evaluate and improve our sites and service performance or to identify individuals whom may threaten the security or integrity of our sites or the Signal service.
25. **Law Enforcement:** We may disclose your IP address to law enforcement authorities if requested by the authorities to do so or if directed to do so by the courts.

Cookies

26. **Cookies:** A cookie is a piece of information that our web server may send to your machine when you visit our sites. The cookie is stored on your machine, but does not identify you or give us any information about your computer.
27. **Use of Cookies:** A cookie helps us to recognise you when you re-visit our sites and to co-ordinate your access to different pages on our sites. We use cookies to learn more about the way you interact with our content and help us improve your experience of using our sites.
28. **Disabling cookies:** With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored. If you want to do this, refer to your browser instructions or help screen to learn more. If you reject the use of cookies, you will still be able to access our sites but please note that some of its functions may not work as well as if cookies were enabled.

Links to other sites

29. **Third party links:** We may provide links on our sites to other sites. If you use these links, you will leave our sites and we are not responsible for any third party sites, their content or their usage of your personal information. We advise that you check the terms and conditions of use, the privacy policies and any other guidelines for access and use on those sites as they will apply to your access and use of those sites and any services and information contained on such sites.

Information validation and security review

30. **Validation:** You authorise us to use and disclose your personal information for the purposes of validating the information you provide to us in the course of signing up to and using our sites and the Signal services.
31. **Transmission:** We take reasonable measures to protect all personal information stored within our database and during our processing activities. However, the transmission of

information using the Internet and other third party systems is not completely secure. We therefore cannot guarantee the security of data transmitted to our site (or via our services) and any transmission is at your own risk.

HOW TO CONTACT US

- 32. Further Information:** Please contact our privacy officer at info@getsignal.info if you:
- 32.1 wish to discuss any privacy issues;
 - 32.2 wish to raise any objections to the way in which we deal with your personal information;
 - 32.3 have any concerns regarding your personal information
 - 32.4 do not wish to receive any future communications from us.
- 33.** By using our sites and/or providing your personal information to us, you are consenting to the collection, holding, use and disclosure of that information as set out in this Privacy Policy.

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