

OptiFleet Privacy Policy

8 June 2022

Welcome to our privacy policy. This policy applies across all websites owned and operated by Optimal Fleet Solutions Limited, including www.optifleet.co.nz and www.bestcar.co.nz, and all other services we provide. For the purpose of this policy, we'll just call them our "services". We may need to update this policy from time to time. Where a change is significant, we'll let the individual or their organisation know – usually by sending an email.

Personal information

This policy applies to information about identified or identifiable individuals, that is provided to us through our services. This includes:

- (a) **Contact information.** User registration and profile information, such as contact name, email, address and phone number; or
- (b) **Usage information.** Information about how users interact with our services, such as browser type.

How we collect it

The ways we collect personal information are broadly as follows:

- (a) **Information provided to us directly.** When someone uses our services we may ask them or their organisation to give us personal information, such as the user's contact information. This information doesn't have to be provided, but if it's not then some or all of our services may be unavailable.
- (b) **Information collected automatically.** We collect some information automatically when someone uses our services, like their IP address and device type. We also collect information when someone navigates through our websites, including what pages they looked at and what links they clicked on. This information is useful for us understanding how people use our services helps us continue to provide the best experience possible (e.g., by personalising the content they see). This information may be collected using cookies and similar tracking technologies.
- (c) **Information from third parties.** We collect most of our personal information directly from the individual or their organisation, but sometimes we may collect personal information from other sources, such as publicly available materials or trusted third parties like marketing and research providers. We may use this information to supplement personal information we already hold, in order to better inform, personalise and improve our services, and to validate the personal information already provided.

How we share it

Trust in our services is very important to us, which is why we doesn't share personal information with others except as follows:

- (a) **With permission.** When we have permission from the individual or its organisation to share.
- (b) **For permitted purpose.** When sharing is reasonably required in connection with any use that is permitted below (for example to our contractors) and we've taken reasonable steps to ensure the recipient only uses and shares the information in the same way that we can.
- (c) **Anonymised.** When we remove individual names or any other personally identifying information from it (for

example by aggregating it with information about other users).

- (d) **Legal compliance.** When we believe sharing is appropriate to comply with law; facilitate court proceedings; enforce or apply an agreement; or protect the rights, property, or safety of our customers, users, or others.
- (e) **In business acquisition.** When sharing is to an actual or potential buyer (and its agents and advisors) in connection with an actual or proposed purchase, merger or acquisition of any part of our business.

How we use it

First and foremost, we use someone's personal information to provide our services to them and their organisation, and to manage our relationship with them.

We may also use personal information as follows:

- (a) **For authentication.** To verify someone's identity.
- (b) **To communicate with users.** Including by:
 - (i) providing information they request (like training or education materials) or information we are required to provide;
 - (ii) providing operational communications, like changes to our services, security updates, or assistance with using our services
 - (iii) sending electronic newsletters and promotions in relation to our services (which will contain clear instructions for how to unsubscribe from the mailing list);
 - (iv) asking for feedback or participation in any research we are conducting (which we may engage a third party to assist with).
- (c) **For support.** This may include assisting with the resolution of technical support issues or other issues relating to our services, whether by email, in-app support or otherwise.
- (d) **To enhance our services and develop new ones.** For example, by tracking and monitoring use of services so we can keep improving, or by carrying out technical analysis of services so that we can optimise user experience and provide more efficient tools.
- (e) **To protect.** So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our services fairly and in accordance with our terms of use. Also to enforce or apply the agreement and help protect the rights, property, or safety of our customers, users or others.
- (f) **To analyse, aggregate and report.** We may use personal information we collect to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

How we secure it

Security is a priority for us when it comes to personal information. We're committed to protecting personal information and have appropriate technical and organisational measures in place to make sure that happens.

We may transfer and process personal information in countries other than New Zealand – such as to Australia where our data hosting provider's servers are located. These countries may have different privacy laws to ours, but when transferring personal information outside New Zealand we ensure safeguards are in place to ensure the personal information remains protected.

How long we keep it

The length of time we keep personal information depends on what it is and whether we have an ongoing business need to retain it (for example, to provide a service someone requested).

We'll retain personal information for as long as we have a relationship with the individual or their organisation and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

Individual rights

Each individual has rights to their personal information, including:

- (a) to know what personal information we hold about them, and to make sure it's correct and up to date
- (b) to request a copy of their personal information

Individuals can exercise these rights at any time by making a request to hello@optifleet.co.nz.