

Porter Group – Privacy Policy

Effective from 1 January 2021

In this Privacy Policy (**Policy**), any references to “**we**”, “**us**” or “**our**” shall be reference to the Porter Group, which comprises:

- (i) Porter Finance Limited; Porter Hire Limited; Porter Equipment Limited; Porter Haulage Limited, Porter Access Hire Limited, Porter Cranes Limited, Porter Mechanical Limited, Porter Parts Limited; Porter Properties Limited; A.F. Porter Limited; Porter Access Limited; Porter Developments Limited; Porter Heavy Haulage Limited; Porter Group Corporate Services Limited; Eagle Spares Limited; Narm Finance Limited; Porter Group Holdings Limited; and
- (ii) any other company (whether incorporated in New Zealand or otherwise) which is related to any company specified in (i) above in the manner provided in section 2(3) of the Companies Act 1993.

This Policy applies to customer and other third party personal information (referred to as “**you**” and “**your**”), rather than the personal information of our employees or independent contractors. We have a separate policy that deals with employee and independent contractor personal information.

Your privacy is important to us, we respect your personal privacy and are committed to maintaining your trust and confidence in the way we collect, store, use and share your personal information. This Policy sets out how we collect, store, use and share your personal information, and how we comply with our obligations under the Privacy Act 2020.

Personal information includes any information that can identify you as an individual. You have the choice not to provide us with your personal information (other than as required by law). However, this may result in us being unable to provide you with some or all of our goods and/or services, or may substantially reduce the level of service we are able to provide to you, and/or reduce the areas of our website that you will be able to access.

Personal information we collect

We collect personal information as part of our ordinary business operations, including the provision of goods and/or services to you. Personal information that we collect from you may include:

- information relating to your identity, such as your full name, date of birth, address, and information to verify this information (for example passport and/or birth certificate);
- your contact information, including your residential address, work address, postal address, email address and phone numbers;
- information obtained from you when submitting enquiries to us, or providing requests for us to provide goods and services;
- financial information, such as your income, expenses, employment history, credit history, bank statements, payment information and other financial information we reasonably require to consider a request from you for us to provide goods and/or services, including hiring equipment, credit and finance;
- reference information, including trade reference information and referees;
- your transaction, service, purchase and order history with us or with other third parties;
- billing and payment information;

- cookies (as explained below), computer and/or network IP address, and website usage information;
- GPS location information in relation to the location of any goods that you may hire from us;
- various other personal information that you provide to us as part of our business; and other personal information that we are required to collect pursuant to applicable law and pursuant to our internal policies and procedures, for example anti-money laundering legislation and procedures.

When do we collect personal information from you?

We collect personal information from you when you interact with us, or we interact with you. The personal information we collect will depend on the nature and purpose of the interaction us. We will generally collect your personal information when you:

- contact us, whether via our website, telephone, text message, email and/or post,
- enquire about our goods and/or services;
- purchase or hire goods and/or services from us;
- submit an application for finance or credit to us;
- agree to do business with us;
- enter our business premises, via CCTV;
- visit our website at www.portergroup.co.nz or any other website we operate;
- participate in competitions and promotions which may be available from time to time;
- sign up to our mailing lists; and
- engage with our social media platforms.

By providing us with your personal information, you consent to our collection, storage, use, sharing and your personal information and using it in accordance with this Policy and applicable law.

Why do we collect your personal information?

We collect personal information where it is necessary to respond to your request, provide the goods or services you have requested, or to otherwise manage your interaction with us. When we obtain your personal information we will only use that personal information for the purpose for which it is collected, as set out in this Policy or as permitted by law. Generally, we will collect and use personal information from you for the following purposes:

- receiving and responding to your enquiries in relation to our goods and/or services;
- receiving and processing your requests for us to provide goods and/or services to you, contacting you in relation to the goods and/or services you have requested, and providing those requested goods and/or services;
- processing your application for finance and/or credit, and deciding whether to provide finance and/or credit to you;
- to allow us to perform a contract we have with you;
- to act on your requests;
- marketing our goods and/or services to you, including contacting you by phone, text message, post or email;
- helping us to identify other goods and services that might be beneficial to you;

- for our general business processes, management and the improvement of our goods and/or services;
- allowing you to participate in competitions and promotions which may be available from time to time;
- security, anti-money laundering and fraud prevention purposes;
- to ensure the security and safekeeping of any equipment that we hire or sell to you on credit or finance;
- enforcing our agreements with you that relate to our goods and/or services;
- for any other purpose for which the personal information was collected; and
- to allow us to comply with applicable law and our internal policies and procedures, for example anti-money laundering legislation and procedures.

We may collect personal information from third parties

In most instances we will collect personal information directly from you. However, given the nature of the goods and/or services we provide, it will not always be possible to collect all personal information directly from you.

We will only collect personal information about you from third parties as set out in this Policy, where it is reasonably necessary in the circumstances, where we are obtaining such personal information from a publically available source, or where you have provided your express or implied consent. Examples of where we collect personal information about you from third parties include:

- publically available sources, such as the companies office, motor vehicle register or personal property securities register;
- credit referencing and/or reporting agencies;
- your trade references or other referees;
- regulators, government authorities, Courts or the Police;
- our insurers; and
- when we are required to do so pursuant to applicable law or our internal policies and procedures, for example when we independently verify information you have provided pursuant to anti-money laundering legislation and procedures.

Who we may share your personal information with

We may need to share your personal information to third parties from time to time. We will only share personal information with third parties where we are permitted under this Policy, where you have specifically authorised us to do so or where we are permitted or required to in accordance with applicable law. For example, we may share your personal information with:

- third parties that help us to provide the goods and/or services you have enquired about, or purchased, including our subcontractors and service providers;
- all other companies within the Porter Group, including their personnel, directors and shareholders;
- our IT service providers, and data storage providers, who may be located outside of New Zealand;
- our IT and physical security providers;
- any third party for the purpose of protecting us against unlawful activity, fraud, or any danger to public or personal health and/or safety, and security risks;
- payment providers;

- credit referencing and reporting agencies;
- your trade references and referees;
- debt collection, enforcement and repossession agents;
- regulatory and/or government authorities, such as the Police and the Courts;
- our insurers and other professional advisors; and
- third parties that assist us to comply with applicable law and our policies and procedures, for example for independent verification purposes pursuant to anti-money laundering legislation and procedures.

Cookies

At times, cookies may be used to help us serve you better when you use our website. A cookie is a small element of data sent by a website to your browser, which may then be stored on your hard drive so we can recognise you when you return. You may set your browser to notify you when you receive a cookie and, if you wish, to reject it, or clear cookies by using your browsers options.

We may use cookies in connection with your use of our website. If you choose not to have your browser accept cookies from our website you will be able to view text on screens, however you may not experience a personalised visit.

Web beacons, also known as clear gif technology, or action tags, assist in delivering the cookie. This technology tells us how many visitors clicked on key elements (such as links or graphics) on our website. We do not use this technology to access your personal information. It is a tool we use to compile aggregated statistics about the website's usage. We may share this tracking information with third parties.

Direct Marketing

By providing us with your contact details, you agree to receive our marketing and other communications (including commercial electronic messages) electronically (via email or text message) and by post. If you decide that you no longer wish to receive commercial electronic messages from us you can unsubscribe by using the unsubscribe feature in any commercial electronic message, or notifying us by email at privacy@porterce.com, or by contacting us directly by telephone or post.

Links to other websites

Our website or other material may contain links to other websites that we may believe to be useful and informative for you. However, please be aware that we do not endorse or recommend the content of these business or websites and are not responsible for the privacy practices of these businesses or their websites. Please ensure you understand and read the privacy policy and terms of use of each site that you choose to visit.

How we protect and store your information

We are committed to using industry standard practices to keep the personal information you provide to us safe against loss, unauthorised access, unauthorised modification and unauthorised disclosure. We will not retain your personal information for longer than necessary or longer than required by law.

We have implemented a variety of security measures in relation to the protection of personal information.

In some cases we may use technology such as file encryption when we are transmitting personal information from time to time. Where personal information transmission is taking place by unencrypted email, we cannot guarantee that your personal information will remain secure during transmission.

Where we are sharing your personal information outside the Porter Group, we will use reasonable endeavours to require the third party to maintain confidentiality of your personal information.

If we are sharing your personal information with a third party that is not located in New Zealand, and the third party is not a member of the Porter Group, a data storage provider to the Porter Group or otherwise subject to the New Zealand Privacy Act 2020, we will require the third party to protect your personal information in a way that provides comparable safeguards to those in the New Zealand Privacy Act 2020.

What happens if there is a breach of your privacy?

If we believe that there has been a privacy breach, then we will identify the breach and take reasonable steps to minimise any harm caused by the breach. Where we believe any breach of privacy poses a risk of serious harm, or is likely to cause serious harm, then we are required to notify the Privacy Commissioner and affected parties.

Where you believe that there has been a breach in relation to your privacy, then please contact us as soon as possible. Our Privacy Officer's contact details are set out at the end of this Policy.

If you are not satisfied with the way we have dealt with or resolved your complaint then you can escalate this by contacting the Privacy Commissioner at any time:

Office of the New Zealand Privacy Commissioner

Website: www.privacy.org.nz

Phone: 0800 803 909

Email: enquiries@privacy.org.nz

What is your right to access your personal information?

You are entitled to ask whether we hold any personal information about you, access any personal information that we hold about you and to request the correction of any personal information held by us.

If you wish to access or correct personal information held by us then please contact our Privacy Officer on the details set out below.

Changes to our Privacy Policy

We reserve the right to change this Policy from time to time as we see appropriate. In the event we do amend this Policy, we will post the revised version on our website and use reasonable endeavours to draw your attention to the amended policy. The most recent version of this Policy will apply from its effective date.

How to get in touch with us

Your privacy is important to us, if you have a general privacy enquiry or complaint about a privacy breach then please contact our Privacy Officer at: privacy@porterce.com