

CarbonTrail

Privacy Policy

Introduction

CarbonTrail Limited (**we, us, our**) complies with all applicable privacy and data protection laws when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

This policy sets out how we will collect, use, store, disclose and protect your personal information when you use our **CarbonTrail** or **CarbonAPI** website, provide your personal information to us, correspond with us, and/or use our CarbonTrail or CarbonAPI services and products.

This policy does not limit or exclude any of your rights under applicable privacy and data protection laws.

As we are a New Zealand company, our handling of your personal information is governed by the New Zealand Privacy Act 2020 (the **NZ Privacy Act**), in addition to any privacy and data protection laws in your jurisdiction that may apply to our handling of that information. If you wish to seek further information on the NZ Privacy Act, see www.privacy.org.nz.

This policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. We are happy to provide any additional information or explanation needed. Any request for further information should be sent to hello@carbontrail.co or hello@carbonapi.io.

Changes to this policy

We may change this policy by uploading a revised policy onto the CarbonTrail or CarbonAPI website and/or service. The change will apply from the date that we upload the revised policy.

Collection of your personal information

We collect personal information about you from:

- you, when you provide that personal information to us, including via the website and any related service, through any registration or subscription process, through any contact with us (e.g. telephone call or email), or when you buy or use our services and products



- third parties where you have authorised this or the information is publicly available.

Wherever possible, we will collect personal information from you directly.

Personal information we collect about you may include your full name, telephone/mobile number, email address, other contact details, date of birth, payment and transaction information, information about entities that are associated with you, and information relating to your job/role.

If you do not want us to collect, or to provide us with, your personal information, we may be unable to communicate with you, provide you with our services and products, and/or provide an optimal experience of our website.

Cookies

We use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognise your browser) to monitor your use of the website. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of the website or application.

How we use your personal information

We will use your personal information:

- to verify your identity
- to provide services and products to you
- to market our services and products to you, including contacting you electronically (e.g. by text or email for this purpose)
- to improve the services and products that we provide to you by using anonymised personal information
- to undertake credit checks of you (if necessary)
- to bill you and to collect money that you owe us, including authorising and processing credit card transactions
- to respond to communications from you, including a complaint
- to conduct research and statistical analysis (on an anonymised basis)
- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorised by you or applicable law.

Disclosing your personal information

We do not sell, rent, or exchange your personal information to any third party without permission.



We may disclose your personal information for the purposes for which it was collected, and for directly related purposes (including those required by law). Some of these third parties may include, but are not limited to:

- another company within our group
- any business that supports our services and products, including any provider that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products
- a credit reference agency for the purpose of credit checking you
- other third parties (for anonymised statistical information)
- a person who can require us to supply your personal information (e.g. a regulatory authority)
- any other person authorised by the Act or another law (e.g. a law enforcement agency)
- any other person authorised by you.

Our internet and data services provider, Amazon Web Services, is located outside New Zealand (the country where we are incorporated) and may also outside of the country where you are located. This may mean your personal information may be held and processed outside New Zealand and/or outside the country where you are located.

If at any time we need to transfer personal information internationally, , we will only do so in accordance with applicable privacy and data protection laws.

Protecting your personal information

As required by applicable law, we will take steps to keep your personal information secure and safe from loss, unauthorised access, use, modification, disclosure, or other misuse. We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks inherent in processing personal information.

You play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used in relation to our products and services. You should not disclose your password to third parties. Please notify us immediately if there is any unauthorised use of your account or any other breach of security.

Retention of your personal information

We will only retain your personal information for as long as is required for the purpose/s for which it may lawfully be used. Once personal information is no longer required (including if your account for using our services is deleted), we will securely destroy it or otherwise delete all identifying details so that only anonymised data is retained.



Accessing and correcting your personal information

Subject to certain grounds for refusal set out in applicable privacy and data protection laws, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email us at hello@carbontrail.co. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

Subject to applicable law, we may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

Internet use

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

Mandatory reporting of notifiable privacy breaches

If your personal information is involved in a privacy breach which we reasonably believe has caused or is likely to cause serious harm to you, we will inform you and recommend what steps you should take in response. We will also report notifiable privacy breaches as required under applicable privacy and data protection laws, including to the New Zealand Office of the Privacy Commissioner where required under the NZ Privacy Act.

Contacting Us

If you have any questions about this privacy policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us at hello@carbontrail.co or hello@carbonapi.io.



If you are not satisfied with how we have handled your request or complaint, you can contact the New Zealand Office of the Privacy Commissioner on [+64 4 474 7590](tel:+6444747590) or at www.privacy.org.nz and/or your local data protection authority.