

## my2cents – PRIVACY POLICY

### Definitions:

In this policy:

- (a) "we", "us" or "our" means Camorra Data Limited, the owner of this my2cents website. My2cents is operated and maintained on behalf of Camorra Data Ltd by [Camorra Research Ltd](#);
- (b) "you" means you, the person that has registered to participate in our online my2cents research community surveys, online discussions or focus groups, or is visiting this my2cents website; and
- (c) "my2cents website" or "website" means this website ([www.my2cents.co.nz](http://www.my2cents.co.nz)).
- (d) "client" or "clients" means the organisations that engage Camorra Data Limited to undertake research with my2cents members. This currently includes, but is not limited to, the following major banks operating in New Zealand: ANZ Bank New Zealand Limited; ASB Bank Limited; Bank of New Zealand; Kiwibank Limited; Westpac New Zealand Limited and any of their related entities

### Other policies applying:

This Privacy Policy applies in conjunction with our my2cents [Terms and Conditions](#). It does not alter or affect any other policies or terms and conditions. By using the my2cents website you agree to be bound by this Privacy Policy.

### Collection of your personal information:

This Privacy Policy relates to the personal information that you provide to us through your participation in the my2cents research programme (including the introductory survey, all other surveys, online discussions and focus groups). By using the my2cents website you acknowledge that you have read the terms of this Privacy Policy and you consent to the collection and use of your personal information in accordance with the terms of this Privacy Policy.

In order to be accepted as a member of the my2cents research community, you will be asked to complete an introductory survey which we will use to determine your suitability for the my2cents research community.

In the event that you are not accepted as a my2cents research community member, any personal information that you have provided to us during the registration process and in the introductory survey (such as your name, address and email address) will be deleted and not be further used by us.

If you are accepted as a member of the my2cents research community, we will collect and store the personal information that you have provided to us in the introductory survey and the information that you provide to us each time you complete a survey, or participate in discussion groups or focus groups.

### Usage and disclosure of your personal information:

You agree that we can use the personal information you provide us to do any of the following things:

- to identify appropriate surveys, online discussions and focus groups for you to complete;
- to operate, manage and administer this my2cents website and our research programme;
- to comply with any laws in New Zealand or overseas applying to us;
- for market research purposes;
- to notify you and verify your identity if you win a prize in any prize draw or competition associated with your participation in our market research including surveys, online discussions and focus groups; and
- conduct data processing and statistical analysis.

### Your personal information will not be used for direct marketing purposes.

By registering as a my2cents research member, you consent to your personal information (such as your name and email address) to be provided to financial institutions you tell us you use.

**Commented [AS1]:** Remove hyperlink and should be ok?

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**Commented [NA2]:** I assume that participants will be provided with the opportunity to review and actively accept the terms of this privacy policy *before any personal information is collected*. I note that this is a requirement under the Privacy Act 1993 (in particular Information Privacy Principle 3).

In particular participants should be provided with a link to the policy prior to entering any info as part of the introductory survey / registration process.

**Commented [nh3R2]:** Link to PP is on the landing page from the introductory survey ("profiller"), and in the footer of my2cents webpages. User shown and has to accept Ts and Cs as part of introductory survey

**Commented [KR4R2]:** Also we reference that registration and acceptance of the T&C is acceptance of the PP.

**Commented [ST6]:** It would be helpful to understand what this actually means – do they delete / destroy the info (because why keep it if they will not be using it? If they plan to keep it for a period, what is it and why retain it at all).

**Commented [nh7R6]:** Delete personal information.

**Commented [NA8]:** Should this be deleted (given the sentence below which states that personal information will not be used for marketing purposes)?

**Commented [nh9R8]:** My2cents sole purpose is market research – either online surveys, online discussions, face to face focus groups or interviews. Camorra is a member of Research Association NZ and adheres to code of practice and ESOMAR (Intl research Assn)

**Commented [ST10]:** Is the distinction here between market 'research' and direct marketing? If so I'd suggest changing this to read "Your personal information will not be used for the purpose of direct marketing".

**Commented [nh11R10]:** Added 'direct'. Market research is not direct marketing.

In addition, your responses to surveys, online discussions or focus groups will be provided to the client(s) commissioning the survey. Your survey, online discussion and/or focus group responses may be augmented with additional information they have about you for analysis, reporting, modelling purposes.

Any responses you provide to surveys, online discussions and focus groups will only be supplied to the client(s) commissioning the survey, online discussion or focus group. Our clients may also use other contractors and agents for the purpose of assisting them to analyse and report the research conducted on my2cents. The use of your personal information and responses to surveys, online discussions or focus groups by our clients will be covered by the Terms and Conditions, Security and Privacy Policy and statements of each financial institution.

Your personal information may be disclosed to our contractors and agents that assist us to operate, manage and administer my2cents (including, but not limited to, [Camorra Research Limited](#)).

We will communicate with you by email to your email address, and you consent to us communicating using the contact details you provide to us.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at [support@my2cents.co.nz](mailto:support@my2cents.co.nz).

**We will not:**

- **use your personal information, or allow your information to be used, for another company's market research unless that company is a contractor or service provider working with us or our clients;**
- **use the personal information you provide as part of your membership of my2cents to advertise or promote, goods or services to you; or**
- **ask you to provide your specific banking details like bank account number, credit card number, online banking or phone banking details.**

**Storage of your personal information:**

Your personal information you provide us will be collected and stored using cloud technology by our software provider Vision Critical, and physically stored at secure facilities located in North America or Singapore.

Unfortunately, no data transmission over the internet can be guaranteed as totally secure. Accordingly, although we strive to protect your information, we cannot ensure or warrant the security of any information transmitted using this my2cents website.

Similarly, no data stored using cloud technology can be guaranteed as totally secure. Accordingly, although we strive to protect such information, we cannot ensure or warrant the security of this information and it is stored at your own risk. Vision Critical is not responsible to you for the collection, storage and use of your information.

**Cookies:**

The my2cents website uses both persistent and session cookies. Cookies are small pieces of information, which can be stored on your hard drive (persistent cookies) or in memory (session cookies). The cookies we send to your PC cannot read your hard drive or command your computer to perform any action.

The session cookies hold information that is uniquely generated when you log in. They are used to determine that you are who you say you are, and to provide you with information whilst you are logged into this my2cents website. No personal information is kept in the cookie and the cookie is not permanently written to your hard drive. When you log out of this my2cents website the cookie is no longer valid and is discarded when you close your internet browser.

**Changing this policy:**

We may change this Privacy Policy at any time by adding to, removing or amending the existing terms. Amendments may take the form of a completely new policy. We will inform you about any changes that we make by posting an updated policy on our website. Changes will be effective from the date that the updated policy is posted.

**Commented [ST12]:** I'm assuming that for each survey / online discussion / focus group my2cents would be specifically listing the sponsoring client / clients? So, for example, could a my2cents community member see that WNZL was sponsoring a particular survey and choose not to complete it?

**Commented [NA13]:** IPP 3 requires that agencies are required to take reasonable steps to ensure that individuals are aware of the agency that collects and holds their personal information. If any other entities, aside from Camorra Research Limited, will hold personal information, details of those entities should be provided.

**Commented [ST14]:** If there are any other specific agencies which will hold / exercise control over information collected (so would be considered to be a 'controller' of personal info under the GDPR model), I think this is something that should be explicitly called out. Where 3<sup>rd</sup> party suppliers are being used for processing purposes only, but don't exercise direct control over the info, I think there is less of an impetus to specifically list these agencies.

**Commented [nh15R14]:** None

Under the Privacy Act 1993 you have rights of access to and the ability to request a correction of the personal information that we hold about you. If you wish to access or correct such information, or if you have any questions about this Privacy Policy please contact us at [support@my2cents.co.nz](mailto:support@my2cents.co.nz).