



THE STERLING
KAIAPOI

Privacy Policy

Introduction

1. The Sterling (Kaiapoi) Limited (“we”, “us”) respects your privacy and values the information you share with us.

How we Collect your Information

2. When you use our services (including our website, apps and social media pages) and when you interact with us, we may collect personal information about you. This may include information such as personal details, contact details, health information, billing information, IP address and computer or network information.
3. We may collect and store information (including personal information) in a number of ways, such as when you contact or interact with us, when you apply for any of our services, through our website, apps or social media pages, locally on your device, by using cookies, from third parties and in software (such as client relationship management software), in the Cloud and in offline backups.

For what Purposes do we Collect, Hold, Use and Disclose your Personal Information?

4. We use your personal information to:
 - a. provide information or services to you (with your consent, if required by law) or to carry out a contract with you;
 - b. communicate with you on matters relevant to you and our services or any other opportunities or transactions with us;
 - c. market our services which may be of interest to you, unless you unsubscribe or inform us not to;
 - d. analyse and improve our services or website;
 - e. and provide information to third parties as authorised or required by law or a Court or Tribunal.
5. We will take reasonable steps under the circumstances to check that the personal information we collect, use or disclose is accurate, complete, relevant, not misleading and up to date.



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What Happens if we Cannot Collect your Information?

6. The provision of your personal information is voluntary, except in some circumstances where it is required by law.
7. If you cannot or will not provide us with your personal information that we reasonably require, however, some or all of the following may happen:
 - a. we may not be able to contact you or otherwise interact with you;
 - b. we may not be able to provide our services to you or to enter into a contract with you, either to the same standard or at all;
 - c. we may not be able to provide you with information about our services that you may want.

When do we Disclose your Information?

8. We will never sell, rent or trade your personal information. We may share your personal information with third parties, however if doing so is directly related to the purposes for which you have provided the information to us, where required or permitted by law or where you give us your permission to do so.
9. We may share your information with:
 - a. any parties necessary to provide the products or services which you request from us;
 - b. any parties necessary to provide you with access to our website and external IT service providers to assist in ensuring the security of our computer network is maintained;
 - c. your authorised representatives or your legal advisers (when requested by you to do so);
 - d. credit reporting bodies or fraud checking agencies;
 - e. our authorised staff members and professional advisers, including our accountants, auditors and lawyers;
 - f. government and regulatory authorities and other organisations, as required or authorised by law;
 - g. our sub-contractors or third party service or product providers as may be determined to be necessary or appropriate; and
 - h. our marketing partners.



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Our Website

10. Our Privacy Policy also applies to our website at www.thesterling.co.nz.
11. Our website may contain hyperlinks to other websites operated by third parties. We are not responsible for the content of such websites, or the manner in which those websites handle any personal information you provide.
12. Like many companies, we will sometimes use "cookie" technology on our website. A "cookie" is a small summary file containing a unique ID number, which is stored on your computer by your browser. When you log in, the cookie tells us whether you have visited the website before or if you are a new visitor. The cookie does not obtain any personal information about you or provide us with any way to contact you, and the cookie does not extract any information from your computer. We use the cookie to help us identify the relevant website features in which you have the greatest interest, so that it may better personalise your access to the website.
13. We also use the cookie to collect anonymous data from and about users of our website. This includes for our digital advertising purposes, for example, in respect of our remarketing activities which also employ user tagging technology such as Floodlight tag. Platforms we may use for collecting such data may include DoubleClick Campaign Manager, DoubleClick Bid Manager, Facebook Business Manager, and Google AdWords. The data collected is encrypted and does not include any personally identifiable information.
14. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

Security

15. We are committed to keeping your personal information secure and will take reasonable precautions to protect it from loss, misuse or unauthorised alteration.
16. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem.

Access and Correction

17. You are entitled to request access to your personal information that we hold and, if necessary, to request correction of that information. If you wish to



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access your personal information that we hold please forward your request, in writing, to our Privacy Officer at: alan@thesterling.co.nz

Changes

18. We reserve the right to amend, withdraw or replace this policy at any time.