NZ COLLECTION AND USE OF YOUR PERSONAL INFORMATION

This document is to be read in conjunction with all NZ Storage Agreements. It forms part of the legal relationship between you (the Storer) and the Owner/Facility, its employees and any other person entitled to enforce the Agreements.

Empire Storage Limited is committed to protecting and maintaining the privacy, accuracy and security of your personal information. This privacy policy sets out details of how we collect, use, store and disclose your personal information. By accessing and using our website or storing with us, you consent to the collection, use, storage and disclosure of your personal information in accordance with this policy.

HOW WE COLLECT YOUR INFORMATION

We will only collect personal information relevant to our business relationship with you. The personal information we collect will generally include your name, address, telephone numbers, email address, credit card or bank account details, date of birth, driver licence details, passport number, CCTV footage, information about your use of our services, and any other information we reasonably require to do business with you.

We will collect this information directly from you when you:

- sign up for storage with us
- access our storage facilities; and
- communicate or interact with us, whether by email, telephone or otherwise.

We also collect information about your credit history, storage history, debts, financial information and any information necessary for any investigation by us from third parties (such as StorerCheck or any relevant credit history entity, law enforcement agencies and publicly available sites (e.g. the NZ Companies Office website) to help us assess whether to provide (or continue to provide) you with storage, manage our risk and any investigation.

You may choose to not provide us with this information, but not doing so may affect our ability to provide you with storage. You are required to keep us informed of changes to your information to enable us to have proper administrative processes.

We may also collect aggregated information generated by our system, which tracks your use of our products and services but does not identify you personally.

COOKIES

Our website uses server logs and web analytic tools (such as “cookies”). Cookies are small text files that are downloaded to your device by websites that you visit. When you use our website, these tools collect information such as the browser and operating system that you use, the internet protocol address of the device you use to access the site, search terms, your location and the content that you view when visiting the website.

You can set your browser to block all cookies, including cookies associated with our website, or to indicate when a cookie is being set by us. If you set your browser to reject cookies you may not be able to access all the features of the website.

HOW WE USE YOUR INFORMATION

We may use your personal information to:

- identify you and assess your application for storage;
- ensure security of the facility and the goods and people within the facility;
- communicate with you;
- carry out our business which includes maintaining your account, planning, training, product development, research and analysis;
- manage our risk, including enabling us to undertake a search of the StorerCheck database, or any relevant credit history entity;
- undertake appropriate searches, including a PPSR search, if your account goes into default;
- enforce our agreement with you in any way;
- fulfil our legal requirements (for example, disclosure to law enforcement agencies or the courts) and/or for any related purpose in connection with the above.

We may use any information that we collect that is not personal information (so you cannot be personally identified from it) for our business purposes, including:

- to assess how our customers use the storage facility;
- to improve our products and services; and
- for marketing and promotional purposes.

MARKETING

We may use your information to offer you products and services that we believe meet your needs. You can notify us at any time if you do not wish to receive these offers by emailing us at steve@empirestorage.co.nz or writing to us at **199 Belfast Rd, Belfast, Christchurch 8051**. We will act promptly on any such request.

STORERCHECK

We subscribe to the StorerCheck system. StorerCheck is a database for the storage industry to identify and store information about problem storers. By applying to store with us, you agree that we may:

- search the StorerCheck database for information StorerCheck may have about you and collect such information about you;
- discuss and collect your personal information with other StorerCheck members;
- refuse you storage or terminate your storage agreement if you are listed with StorerCheck;
- update any of your personal information in StorerCheck and add any relevant new information; and
- release your personal information to StorerCheck if you breach your storage agreement in any way or behave in an illegal or threatening manner.

WHO WE MAY DISCLOSE YOUR INFORMATION TO

We may disclose information we retain about you, including your personal information, to the following persons or their agents:

- our employees, contractors, and our related entities;
- third parties engaged by us to perform specific functions for our business, such as auctioneers, second-hand dealers, building contractors, maintenance services, investigators;
- service providers engaged by us, such as data storage, IT, software management, insurers and financial services;
- government departments and agencies;
- law enforcement agencies (including the Police);
- any person who can demonstrate to our reasonable satisfaction has a legal or equitable interest in the goods stored;
- liquidators, administrators or other persons appointed to administer your financial affairs;
- debt collection services or credit reporting agencies;
- your Emergency Contact Person (ECP);
- your Alternate Contact Person (ACP), if you provide one;
- StorerCheck; and
- storers or third parties who reasonably believe that you have caused damage or injury to that Storer or third party.

Some of the persons listed above may be located overseas. We will only transfer your personal information to a recipient that is obliged to protect your personal information with comparable safeguards to those contained in the Privacy Act 2020, or otherwise we will obtain your express consent to transfer or store the personal information.

We may disclose, sell or transfer to third parties any non-personal, aggregated information that we collect about you and our other customers.

EMERGENCY CONTACT PERSON

If you provide us with details of an Emergency Contact Person (**ECP**), you confirm that you have an existing relationship with the ECP and have made the ECP aware you are providing their contact details to us as your emergency contact person. We collect and use their contact details only so we can contact them about an emergency or urgent issue affecting you, your Space, your Goods or the Facility, including if we cannot contact you. We do not use ECP details for marketing, credit reporting, StorerCheck reporting, debt collection or routine account administration.

ALTERNATE CONTACT PERSON

It is your responsibility to ensure that you have obtained your Alternate Contact Person's (**ACP**) consent to disclose their information to us, and that we may use their personal information as we would personal information collected about you. You will be in breach of your agreement with us if you have not obtained your ACP's consent.

YOUR PERSONAL INFORMATION IS SECURE

We will take reasonable steps to keep your personal information secure and confidential. This includes the following:

- only our staff and those who perform services on our behalf, and are authorised to handle your information, will have access to your personal information;

- we will not retain any of your information for any longer than it is required by us except to fulfil our legal obligations or where you have consented; and
- we will, with your help, keep your personal information accurate, complete and up-to-date.

YOU HAVE ACCESS TO YOUR INFORMATION

You can access most of the personal information we hold about you and request corrections. This right is subject to some exceptions, for example, you may not obtain access to information relating to existing or anticipated legal proceedings. If we collect biometric information, you may also request our assessment any relevant proportionality assessment we have completed.

You can request access to your information by emailing us at steve@empirestorage.co.nz or writing to us at **199 Belfast Rd, Belfast, Christchurch 8051**. This service is free unless the information you request requires significant research or preparation time. Before we act upon requests of this nature, we will tell you how much this service will cost.

WHAT TO DO IF YOU THINK WE HAVE MADE AN ERROR

We are committed to protecting your privacy and our policies, processes and systems have been developed with this in mind. However, if you think we have made an error, please write to us or email us at steve@empirestorage.co.nz to let us know. Where we have made an error, we will endeavor to correct the error as soon as reasonably practicable.

QUESTIONS AND COMPLAINTS

If you have a question or complaint about our privacy policy or the way we have dealt with your personal information, please write to us at **199 Belfast Rd, Belfast, Christchurch 8051** or email us at steve@empirestorage.co.nz. We will endeavor to respond promptly to your question or complaint.

BREACHES OF YOUR PRIVACY

We take our privacy responsibilities seriously. In the unlikely event that a suspected or actual breach of your personal information occurs, we will investigate the breach. We will notify you and the Privacy Commissioner if we reasonably believe that the breach has caused you serious harm or is likely to cause you serious harm.

CHANGES TO POLICY

We may change this policy at any time by publishing the amended policy on our website. We will endeavor to inform you of any changes to the policy by email or on the website.