

# Privacy Policy

This outlines our Privacy Policy. Our policy is to respect and protect the privacy of our users. This policy statement tells you how we collect information from you (the Customer) and how we use it. We follow five core principles of privacy protection:

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## 1. Notice/Awareness

This Privacy Policy is being placed as a link on WhosOnLocation (the 'Service') pages, a practice that is becoming an industry standard location for Web Service privacy policies.

## 2. Choice/Consent

The following paragraphs describe the type of information we collect and the reasons why we collect the information. By providing the information requested, and by continuing to use the Service after having an opportunity to review our privacy policy, you have consented to our use of the information we collect as described at the point of collection or in this policy.

### 2.1 User Supplied Information

1. You control who has access to Your Data
2. The Data entered, or imported on instruction, by You is stored securely in a database and is only accessible to any person You have authorised to use the Service (Invited Users).
3. By using the Service you (whether an individual or company or other legal entity), your Employee, and your Guests are asked to supply information in order for the Service to perform its core purpose – that being the management of people into and out of your organisations operations.
4. When you register an account to become a WhosOnLocation client we record Employee and/or Contractor (User) profile information such as names, e-mail, department, phone, mobile and a password. If Add-ons are activated User information can include a photo and uploaded documents against their profile.
5. When Guests check into and out of the Service we record their name, where they are from, and the date and time they arrived onsite and departed. Other information can be captured depending on the requirements of the client.
6. We use this information to provide the core Service of WhosOnLocation. Information is available to users via the Service tools or by your direct request to our helpdesk. The information we collect in this manner is not used for any other purpose. No personal customer, user, Employee or visitor data will be copied to, or shared with, any other party without the prior written consent of you.
7. As the data entered into the Service is managed by you, we are not responsible for the integrity of the data entered into the Service nor any consequences resulting from incorrectly entered information.

### 2.2 It is Your responsibility to keep Your password safe.

WhosOnLocation, WhosOnLocation's Employees and WhosOnLocation's partners do not have access to Your password and are therefore unable to access Your Organisation's account or Data without receiving an invitation to do so from You via the Helpdesk.

### 2.3 Disclosure of Information

1. We may disclose user information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action

against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property or other users of the Service, or anyone else that could be harmed by such activities. We may disclose user information when we believe in good faith that the law requires the disclosure.

2. We do not use any customer data for testing.
3. We may share aggregate information about our users with business partners and other third parties. For example, we may say x percent of our clients are Government Departments or y percent of our Clients operate in this sector.

## **2.4 Your IP Address**

The Service collects IP addresses for the purposes of system administration, to generate aggregate information, and to audit the use of our Service. When you request pages from WhosOnLocation, our servers log your IP address. We do not normally link IP addresses to anything personally identifiable, which means that your session will be logged, but you remain anonymous to us. We can and will use IP addresses to identify a user when we feel it is necessary to enforce compliance with our terms of use of the Service or to protect our service, site, customers or others.

## **2.5 Use of Cookies**

We do not use cookies that contain any personally identifiable information.

## **3. Access/Participation**

You may access the data collected by us about you by sending a request to the address listed below. If you believe that an error has been made in the accuracy of the data collected from you, we will correct such error upon adequate verification of the error and the identity of the person seeking the correction.

If you wish to access, remove or correct any personally identifying data you have supplied to us you may do so by:

- Sending an e-mail request to [helpdesk@whosonlocation.com](mailto:helpdesk@whosonlocation.com).

Please understand that in order to protect your privacy and security, we may also need to take reasonable steps to verify your identity before granting access or making corrections.

## **4. Information Sharing, Data Protection, and Security of the Data Collected**

### **4.1 Information Sharing**

Except as described in this Policy, WhosOnLocation will not give, sell, rent or loan any personal information to any third party. We may disclose such information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law. WhosOnLocation may also provide non-personal, summary or group statistics about our customers, sales, traffic patterns, and related Site information to reputable third-party vendors, but these statistics will include no personal information.

### **4.2 Protection of Information**

WhosOnLocation is committed to ensuring the security of your personal information. We take every precaution to protect the confidentiality and security of the personal information placed on the Site or used within the Service, by employing technological, physical and administrative security safeguards, such as firewalls and carefully-developed security procedures. For example, when You enter sensitive information (such as login credentials and all your activity on our Service platform) We encrypt the transmission of that information using secure socket layer technology (SSL). These technologies, procedures and other measures help ensure that your data is safe, secure, and only available to You and to those You authorized access.

The Service uses COMODO 2048-Bit Encryption to secure data information transfer, is EV SSL Certified, and is stored in a secure server facility in major Data Centres. The Data Warehouses are physically protected as there is no external signage identifying the buildings, there is a 24-hour Security Guard posted on-site, the facilities are monitored for intrusion 24 hours a day. Guests must provide Photo ID and are escorted throughout their visit. To minimise systems outage and Service down-time the facility employs multiple UPS's and on-site generators. All servers are on a dedicated Firewall with robust check-point security.

You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications at all times.

### 4.3 Our Access to Your Information

WhosOnLocation Support may ask you to grant us login access in order to assist you with a question, issue or request.

Granting login access allows WhosOnLocation Support to view your account for one hour. WhosOnLocation Support cannot view any customer account data unless permission is granted by a user like yourself.

During the effective access period, they will be able to access your data in order to help you resolve any problems.

WhosOnLocation Support will never ask for your password, either via phone or email.

If we need to log into the application, we will always ask you or another of your users to grant login access. If you receive any email requests for your password from a source pretending to be from WhosOnLocation, please report via email to [trust@whosonlocation.com](mailto:trust@whosonlocation.com).

### 4.4 Australia and New Zealand Privacy Policy Statement

#### **Compliance With The Australian Privacy Act 1988 (Commonwealth) and the Australia Privacy Principles:**

In Australia, the key privacy legislation applying to WhosOnLocation is the Privacy Act 1988 (Cth). The Privacy Act applies to most private sector organizations operating in Australia and sets a national standard for the collection, use and disclosure, quality and security of “Personal Information”. In particular, the Privacy Act establishes the Australian Privacy Principles (APPs) (effective from 12 March 2014) that sets out these key obligations.

We detail our commitments and adherence to the Act in our ANZ Privacy Policy Statement.

#### **Compliance With The New Zealand Privacy Act and Privacy Principles:**

Similar to the Australian privacy principles, New Zealand law lays out 12 information privacy principles (NZ IPPs) for the proper handling of personal information of New Zealand citizens, and these principles can be found at <http://privacy.org.nz/information-privacy-principles>. The Act and 12 IPPs presume that trans- border data flows are permissible provided the IPPs are preserved, which are the case with WhosOnLocation.

We detail our commitments and adherence to the Act in our ANZ Privacy Policy Statement.

## 5. Enforcement/Redress

If for some reason you believe that we have not adhered to our privacy policy, please notify us by the method set forth above. We will do our very best to respond to your concerns and, when appropriate, take steps to correct a problem.

By using this Service, you signify your assent to this policy statement regarding online privacy.

If you do not agree to our terms of use, then please do not use our Service. Your continued use of the Service following posting of changes to our Terms of Use will mean you accept those changes.

### **5.1 You can opt-out of any email communications.**

WhosOnLocation sends billing information, product information, Service updates and Service notifications to You via email, via the Site notifications message board, and if you are following us, via Twitter Updates (<https://twitter.com/WhosOnLocation>).

Where appropriate communication will contain clear and obvious instructions describing how You can opt to be removed from the email mailing list. WhosOnLocation will remove You upon Your request.

### **5.2 You are responsible for checking the Privacy Policy of any third-party applications the Service links to.**

The Service may contain links enabling the electronic transfer of data with third-party applications that your Account Owner has activated under the Add-ons function. WhosOnLocation takes no responsibility for the privacy practices or content of these applications.

#### **This policy may be updated from time to time**

WhosOnLocation reserves the right to change this policy at any time and any amended policy is effective upon the posting on:

- The login screen message board
- Twitter Updates (<https://twitter.com/WhosOnLocation>)
- Email to Administrators.

#### **Please read our Terms of Use**

Use of the Service is subject to WhosOnLocation's Terms of Use and this Privacy Policy should be read in conjunction with this. In the event of a conflict or disagreement between this Privacy Policy and the Terms of Use, the Terms of Use will prevail.

#### **Contact for Questions about our Privacy Policy:**

If you have any questions about the Privacy Policy, the practices of this Website Service, or your dealings with us, you may contact us by sending an email to:

Email at [helpdesk@whosonlocation.com](mailto:helpdesk@whosonlocation.com) or by writing to:

Attn: Privacy Policy  
WhosOnLocation Customer Services  
WhosOnLocation Ltd  
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Wellington, New Zealand 6243

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