

**RCL HENLEY DOWNS LIMITED**

**<http://www.hanleysfarm.nz/>**

**WEBSITE TERMS OF SERVICE/PRIVACY POLICY**

16/12/2020

## Privacy Policy

1. RCL Henley Downs Limited (“RCL” referred to as “we” “our” and “us”) operates the website <http://www.hanleysfarm.nz/> (“Service”).
2. The nature of the services we offer requires that we collect “Personal Information” from time to time as that term is defined in the Privacy Act 2020. Personal Information generally includes any information about an identifiable living individual or from which a living individual could reasonably be identified, but with exception for information which is a publicly available. For example, this may include, name, address, and contact details.
3. In collecting your Personal Information we will comply with the privacy laws of New Zealand, including in particular the Privacy Act 2020 and the 13 information privacy principles.
4. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

## Definitions

“Cookies”	Cookies are files with small amounts of data which may include an anonymous unique identifier. Cookies are stored on your Device and include tracking technologies such as beacons, tags, and scripts to collect and track information and to improve and analyse our Service.
“Device”	means any device that can access the Service.
“Privacy Policy”	means this page, including any future amendments to this page.
“Service Provider”	means any natural or legal person engaged by us to assist with provision of the Service.
“Usage Data”	means data collected automatically relating to how the Service is accessed and used, either generated by the use of the Service (for example, an IP address, browser type, browser version, unique device identifiers and other diagnostic data) or from the Service infrastructure itself (for example, the duration of a page visit, or the pages of our Service that you visit).

## Types of data collected

5. While using our Service, we may ask you to provide us with Personal Information and we may also collect Usage Data.

## Tracking & Cookies Data

6. We use Cookies to track activity on our Service and hold certain information.
7. Cookies may collect anonymous information from your Device and the Service may use and combine such passively collected information to remember important

information to make future visits to the Service more useful and promote our products or services to you by way of targeted advertising.

8. In most cases, you are not obliged to provide us with your Personal Information or consent to disclosure. You can also:
- (a) refuse Cookies; or
  - (b) be notified when a Cookie is being sent;
- via settings on your Device. In this event we may be restricted both in what we can offer to you and the quality of what we can offer.

### **Use of data**

9. We may use the data collected from the Service for various purposes including but in no way limited to the following:
- (a) to provide and maintain a database of current and prospective purchasers;
  - (b) to notify you about changes to the Hanley's Farm development;
  - (c) to allow you to participate in interactive features of our Service when you choose to do so;
  - (d) to provide customer care and support;
  - (e) to conduct market research or for other marketing related purposes;
  - (f) to provide analysis or valuable information so that we can improve the Service;
  - (g) to monitor the usage of the Service; or
  - (h) to detect, prevent and address technical issues.

### **Transfer of data**

10. Personal Information may be transferred to or stored on computers located outside of New Zealand where data protection laws may differ.
11. If you choose to provide information to us, we may transfer the data, including Personal Information, overseas.
12. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.
13. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate controls in place.

### **Disclosure of data**

14. We may disclose your Personal Information in good faith if we believe belief such action is necessary to:

- (a) comply with a legal obligation;
- (b) protect and defend the rights or property of RCL;
- (c) prevent or investigate possible wrongdoing in connection with the Service;
- (d) protect the personal safety of users of the Service or the public; or
- (e) protect against legal liability.

### **Security of data**

15. The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is completely secure. While we strive to use commercially acceptable means to protect Personal Information, we cannot guarantee its absolute security.

### **Service providers**

16. We may engage Service Providers to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used. Service Providers have access to Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Links to other sites**

17. Our Service may contain links to other sites that are not operated by us (“Third-Party Site”). We have no control over and assume no responsibility for the content, privacy policies or practices of any Third-Party Sites.

### **Children’s Privacy**

18. Our Service does not address anyone under the age of 18 (“Children”).
19. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children have provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from children without verification of parental consent, we will take steps to remove that information from our servers.

### **Changers to this privacy policy**

20. We may update this Privacy Policy from time to time. We will notify you of any changes via email or a notice on our Service before making the change.
21. The “effective date” at the top of this Privacy Policy shows the date on and from when any changes to this Privacy Policy became effective.
22. You are advised to review this Privacy Policy periodically for any changes.

### **Contact us**

23. If you have any questions about this Privacy Policy, please contact us: **Angus Ramsay** [angus.ramsay@rclgroup.com.au](mailto:angus.ramsay@rclgroup.com.au)