

CivCost Privacy Policy (Version 01)

Welcome to CivCost's Privacy Policy. CivCost (**we, us, our**) is committed to respecting your privacy and managing your personal information in accordance with the New Zealand Privacy Act 2020 (the **Act**) and any other applicable privacy and data protection laws.

This privacy policy sets out how we collect, use, store, share and protect your personal information in the provision of our personal finance platform and all other related services (**Services**). Please read this privacy policy alongside our Terms of Use as the defined terms all share the same meaning.

This policy was last updated on 12th February 2026.

1. What is your personal information?

"Personal Information" is a term defined in the Act. In general terms, it is any information that can be used to personally identify you. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered as personal information.

2. Personal information we collect

When you visit our website or use our Services, we collect personal information. Your personal information may be collected from you directly, automatically or from third parties.

- **Information you provide to us directly**, including:
 - your Account information, such as your name, company name, email address and login credentials;
 - any project related information that are manually imported into the Services;
 - information related to your organisation structure;
 - your communication with us via social media, text, phone or email; and
 - any personal information you voluntarily provide us during interacting with us.
- **Information we collect automatically**, including:
 - IP addresses and device type;
 - information when you navigate through our websites and services;
 - information about your browser and network; and
 - your use of the website.

The above information is collected using cookies and similar web-tracking systems, such as our Services. If you want to know more about the types of cookies and web-tracking systems we use and how you can control them, please read Section 7 of this policy.

- **Information we get from third parties**, including:
 - analytics information from our analytics providers; and
 - information from third party payment service providers that you use to pay for our fees.

3. How we use your personal information

We collect the personal information to provide you with the Services that you have registered for, requested, or otherwise accessed. The information may be used for the following purposes:

- verify your identity;
- provide our Services to you;
- market our Services and products relating to these Services, including sending you newsletters and up to date information on changes via text, email or other electronic means (from which you can opt out at any time);
- assess and analyse the effectiveness and your use of our Services and other similar purposes;
- maintain and improve Services that we provide to you, including by training and improving any artificial intelligence features, anonymising and aggregating data for research and product development purposes etc;
- notify you about changes to our Services or terms;
- for internal record keeping purposes;
- communicating with you, including responding to a support request or a complaint;
- ensure our compliance with applicable laws and regulations;
- ensure your compliance with our Terms; and
- any other use that is authorised by you or relevant privacy laws.

By using or asking us to provide you with our Services, you consent to your personal information being collected, held and used in this way and for any other use you authorise. We will only use your personal information in the ways outlined in this Privacy Policy or otherwise if we have your express permission.

If you choose not to provide personal information that we request in connection with our Services, we may not be able to provide some or all of our Services to you. For example, you may not be able to access certain features on our mobile application or we may be unable to provide you with information about our Services that you may want.

4. How we hold your personal information

We are committed to keeping your personal information as safe and secure as possible. We use reasonable care including physical, electronic, and procedural safeguards to protect your personal information.

- **Service providers**
Information we hold is stored through our service provider, Microsoft Azure cloud servers located in Australia East region. They store your data securely and protect it through a variety of industry-standard authentication and security controls such as firewalls integrated into the hardware and firmware components, and added protections against threats such as DDoS.
- **Retention**
We will only keep your personal information for as long as it is required in connection with its original purpose or to allow us to comply with legal and reporting obligations.
- **Your responsibility**
Despite our best efforts, the internet cannot be trusted as a secure environment. We cannot provide any assurance regarding the security of transmission of information you communicate to us or authorise that we retrieve online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us, or authorise be transmitted to us, online is transmitted at your own risk. You are also responsible for helping to protect the security of your personal information and of any device on which you access the Services. Please do not enter any credit card details or sensitive personal information when contacting us via email.

If we believe there has been a privacy breach, we will promptly identify the issues and take steps to minimise any harm. We will notify you and any applicable regulator of an actual or suspected data security breach where we are legally required to do so.

- **Account deletion**

If you choose to delete your account, you may do so through the Services or by contacting us using the details provided in section 10 of this policy.

Upon deletion of your account, your access to the Services will be removed and any project data, organisational information, uploaded content and other operational data associated with your account will be deleted or permanently de-identified within a reasonable period, unless we are required to retain it for legal or regulatory purposes.

However, certain core account information, including your name, email address and account creation metadata, will not be deleted. This information will be securely retained in a restricted system environment for the limited purposes of:

- verifying whether an account has previously been created using the same details;
- preventing duplicate, fraudulent or unauthorised account creation; and
- complying with our legal and regulatory obligations.

This retained information will not be used for marketing, analytics, profiling, product development or any other unrelated business purposes. It will not be visible within the Services and will not be accessible to other users.

We will continue to hold and protect this information in accordance with the security safeguards described in this privacy policy and in compliance with applicable privacy laws.

5. Transferring or sharing your personal information

We may transfer or share your personal information to others under the following limited circumstances for the purposes described in this privacy policy.

- **With our service providers, contractors and agents**

We may share your personal information with those who assist and enable us to use and store the information. This is mainly to operate and deliver our Services for the purposes specified in this privacy policy. These service providers are required to use it solely as we direct to provide our requested service and we remain responsible for the information they handle on our behalf.

- **[With third-party payment processors**

Where you pay for the Services online, we may use one or more third party service providers. In these circumstances, we do not process, record or maintain your Billing Information. We record the payment method you have chosen.]

- **For security and legal compliance**

Your personal information may be shared with the regulators, law enforcement bodies, government agencies courts or other third parties where we think it is necessary to comply with applicable laws or regulations, or to protect and defend our legal rights. Where possible and appropriate, we will endeavour to notify you to let you know this has occurred.

- **During a change in ownership**

In the event of a change of ownership of CivCost or the website (including where there is a transfer of a substantive part of the business and assets of CivCost to a new owner), your personal

information may be transferred to the new owner(s) so that we or our Services can continue operations.

- **With your permission**

We may share data with third parties outside the scope of this privacy policy with your consent.

Some of these recipients may be located in overseas countries, which may have privacy or data protection rules different to New Zealand. Where we transfer personal information abroad, we will ensure we take appropriate measures to comply with applicable privacy laws related to such transfer in line with our obligations, such as taking such steps as are reasonable in the circumstances to ensure that the recipients are subject to privacy laws that provide comparable protection to those under the Act.

6. Your rights

You must ensure that the personal information that you provide to us is accurate, complete and up-to-date. Unless there are certain legal grounds for refusing, you may request access to your personal information we have that is readily available or ask us to update or correct your personal information.

We will process your request as soon as reasonably practicable, or we will explain why if we are unable to do so under legal grounds. If appropriate, we may charge you our reasonable costs of providing and/or correcting your personal information. However, we will not charge you for simply making a request.

If you want to exercise your rights above, please contact us using the details provided below in section 10 of this policy. We may require some proof of identity before we provide you with access to or correct

your personal information. If you wish to complain about any outcome or to attach a statement of correction to your record, please see our complaints procedure below in section 8.

7. Cookies and Analytics

Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. (**Google**). Google Analytics uses "cookies" to help us analyse how users use our Site. Cookies are a small amount of data stored on your device and does not allow individuals to be identified. The information generated by the cookies about your use of Services (including your IP address) will be transmitted to and stored by Google. Google will use this information for the purpose of evaluating your use of the Services, compiling reports on Services activity for us and providing other services relating to Services activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of the Services and your use of our Services will be impaired. By accessing and using our Services, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

If you need further information, please visit www.google.com/policies/privacy/partners/.

8. Complaints

You may request further information about the way we manage your personal information or lodge a complaint by contacting us using the contact details below in section 10.

If you would like any further information about our handling of personal information or to make a complaint about something you believe breaches the Act, please lodge a written complaint using the email address below. Once we receive your complaint, we will respond to your complaint within a reasonable period of time, usually within 20 working days.

While we always try to work with you to solve your issue, if you consider your privacy concerns have not been resolved satisfactorily by us, or you wish to obtain more information on privacy requirements, you can contact New Zealand Privacy Commissioner on 0800 803 909 or visit their [website](#).

9. Amendments

We may update this policy to reflect changes to how we manage your information at any time. When we update this policy, we will revise the "Last updated" date at the top of the policy. If the changes are significant, we may also notify you on our website, application or via email before the changes become effective.

10. Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding how your personal information has been collected or handled by us, or a possible breach of your privacy, please contact us at info@civcost.com