

MUSAC PRIVACY POLICY

INTRODUCTION

MUSAC Limited (**we, us, our**) complies with the New Zealand Privacy Act 1993 (the **Act**) when dealing with personal information. Personal information is information about an identifiable individual (i.e. a natural person). This Privacy Policy sets out how we will collect, hold, use, distribute and protect personal information in relation to:

- ▲ your use of any MUSAC services or products (including all MUSAC websites and our software-as-a-service (SaaS) offerings)
- ▲ the use, by a person other than you, such as a school (**MUSAC Customer**), of our services or products to collect, hold, use and distribute your personal information
- ▲ any other dealings you may have with us.

If you are a MUSAC Customer, this Privacy Policy should be read in conjunction with the MUSAC Terms which can be found at <http://www.musac.io/>.

If you are a MUSAC Customer or you provide your consent to a MUSAC Customer to use our services or products to collect, hold, use and distribute your personal information, then you agree to us collecting, holding, using and disclosing personal information in accordance with this Privacy Policy, the MUSAC Terms and the Act.

We require each of our MUSAC Customers to obtain consent from the individuals whose personal information they collect, hold, use and disclose using our services or products. To the extent that we are collecting, holding, processing and disclosing that information, we are acting only as the agent of that MUSAC Customer for the purposes of the Privacy Act 1993 and any other applicable privacy law.

This Privacy Policy does not limit or exclude any of your or any other person's rights under the Act. If you wish to seek further information on your privacy rights, see www.privacy.org.nz or email us at support@musac.io.

CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy by uploading a revised Privacy Policy onto the website. The change will apply from the date that we upload the revised Privacy Policy.

WHO WE COLLECT YOUR PERSONAL INFORMATION FROM

We collect personal information about you:

- ▲ from you, when you provide that personal information to us, including via our website, through any registration or subscription process, through any contact with us (e.g. telephone call or email), or when you use our services or products
- ▲ from MUSAC Customers who are using the MUSAC services or products to collect, hold, use, process and distribute your personal information
- ▲ from third parties where you have authorised this or the information is publicly available.

WHAT INFORMATION WE COLLECT

The personal information we collect may include an individual's name, address, telephone numbers, email address, medical summary, date of birth, national student number, ethnicity and iwi affiliation, education attendance and attainment history, and relationship to a MUSAC Customer or relationship to a student of a MUSAC Customer.

HOW WE MAY USE YOUR PERSONAL INFORMATION

We may (but do not represent or warrant in any case that we will) use personal information:

- ▲ to provide our services or products to you, where you are a MUSAC Customer
- ▲ to verify the accuracy, suitability, or compliance with the MUSAC Terms, of any information provided to us
- ▲ to improve our services or products
- ▲ to respond to communications from you
- ▲ to conduct research and statistical analysis (on an anonymised basis)
- ▲ to protect and/or enforce our legal rights and interests, including defending any claim
- ▲ to investigate any complaint
- ▲ to cooperate with any law enforcement agency or regulatory authority, for the purposes of that agency or authority
- ▲ to take any other steps reasonable for the purpose of maintaining the safety, security or legal compliance of our services or products, for determining compliance by any MUSAC Customer with any law or with the MUSAC Terms, or for the purpose of maintaining the privacy, safety or security of any person about whom we hold personal information
- ▲ for any other purpose authorised by you (including through your consent to the MUSAC Terms or your consent to a MUSAC Customer's use of our services or products) or the Act.

In addition, we may (but do not represent or warrant in any case that we will) use your personal information, where relevant to your dealings with us as a MUSAC Customer or potential MUSAC Customer:

- ▲ to verify your identity
- ▲ to undertake credit checks of you
- ▲ to market any of our services or products to you, including contacting you electronically (e.g. by text or email for this purpose).

DISCLOSING YOUR PERSONAL INFORMATION

We may disclose personal information to:

- ▲ third party agencies e.g. the Ministry of Education where that disclosure is reasonably contemplated by the purposes of the relevant MUSAC services or products
- ▲ another company within our group

- ▲ any third party that supports our services or products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide our services or products
- ▲ where relevant, a credit reference agency for the purpose of credit checking you
- ▲ other third parties (on an anonymised basis)
- ▲ a person who can require us to supply your personal information (e.g. a regulatory authority)
- ▲ any other person authorised by the Act or another law (e.g. a law enforcement agency)
- ▲ any other person authorised by you (including through your consent to the MUSAC Terms or your consent to a MUSAC Customer's use of our services or products) or the Act
- ▲ a third party in relation to the proposed purchase or acquisition of our business or assets.

Any personal information provided to us may be stored on the servers of third parties who support our services, which may be located in New Zealand or Australia.

PROTECTING YOUR PERSONAL INFORMATION

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse, including using encryption means to help protect personal information uploaded via our website or other internet-based services. The internet is not a secure environment and we cannot give you absolute assurance that your information will be secure at all times. Accordingly, where you provide personal information about any person to us over the internet, you do so at your risk. You should take all reasonable steps to ensure that any personal information in your control is at all times secure and protected from loss, unauthorised activity, or other misuse. **MUSAC will never ask you for your password other than as part of the initial registration or login process.**

If you follow a link from us to another site, the owner of that site may have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

We may delete personal information where it is no longer required for the purposes for which it was collected.

BANK ACCOUNT/CREDIT CARD ACCOUNT DETAILS

We do not store within our website any bank account or credit card details, including any related usernames or passwords, where used by a person in the course of making any payment to a MUSAC Customer. Our integrated payment service POLi (operated by Merco Limited) does not receive your bank account or credit card details. POLi is designed to operate in a way that ensures your communication of information is direct between you and your bank. For further information about POLi, please contact POLi at *[insert link]*. For further information on credit card payments please contact Paystation Limited at *[insert]*.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

Subject to the grounds for refusal set out in the Act (including where disclosure would have an unreasonable impact on the privacy of other individuals), you have the right to access your readily

retrievable personal information that we hold and to request a correction to your personal information. If you exercise this right, we may require evidence to confirm that you are the individual to whom the personal information relates. In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction. We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

If you want to exercise either of the above rights, email us at support@musac.co.nz. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting). Please note that it may be necessary for us to arrange for access to your personal information through the principal of your school.

TECHNICAL INFORMATION

We may also collect technical information related to your use of the website or our internet-based services. This may include information about the way you arrive at, browse through and interact with our website or services, including:

- ▲ your IP address
- ▲ the date and time of your access
- ▲ the pages you accessed and documents you downloaded
- ▲ the previous sites you visited
- ▲ the type of web browser software you used.

We may collect this technical information through the use of *cookies* and other means. *Cookies* are alphanumeric identifiers that we transfer to your computer's hard drive to enable our systems to recognise your browser. If you want to disable *cookies*, you may do so by changing the settings on your browser. However, if you do so, you may not be able to use all of our features.

We use the technical information we collect for administration and auditing of our website, services and products, to have a better understanding of the way people use them, to improve the way they work, and to personalise them (and any advertising displayed on them) to be more relevant or useful to your particular needs and interests. We may also use this information to investigate a dispute or for troubleshooting purposes.

FEEDBACK

We welcome your questions and comments about privacy. Please email us at support@musac.io or visit our website at <http://www.musac.io/>.