



Inugo Privacy Policy

Last updated 20 July 2022

Introduction

This notice applies across all websites that we own and operate and all services we provide, including our online and mobile parking management and gate access services products, our websites www.inugo.com and www.payformyparking.com, and any other apps or services we may offer. For the purpose of this policy, we'll just call them our 'services'. Even if you are a user of Inugo's SDK (software development kit) that's integrated into another app, or you are a user of a white-labelled Inugo product with customised bespoke branding, this notice applies to you too!

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number, support queries and so on. If you can't be identified (for example, when personal data has been aggregated and anonymised) then this policy doesn't apply.

Note that Inugo does not save any of your credit card information, as we use a payment processor gateway (Windcave) for credit card payments. Inugo only stores an anonymised digital token received from the payment processor that represents your credit card information held by them. The payment processor will have their own terms & conditions you must agree to in order to use their services.

We may need to update this notice from time to time. Where a change is significant, we'll make sure we let you know – usually by sending you an email.

Who are 'we'?

When we refer to 'we' (or 'our' or 'us'), that means Inugo Systems Limited and all its wholly owned subsidiaries. Our headquarters are in New Zealand but we operate and have offices internationally. Address details for all Inugo offices are available on our Contact us page.

We provide an easy-to-use online platform for gate access control. At the core of our platform is our parking management software. If you want to find out more about what we do, see the About Us page.

Our principles of data protection

Our approach to data protection is built around four key principles. They're at the heart of everything we do relating to personal data.

- **Transparency:** We take a human approach to how we process personal data by being open, honest and transparent.



- **Enablement:** We enable connections and efficient use of personal data to empower productivity and growth.
- **Security:** We champion industry leading approaches to securing the personal data entrusted to us.
- **Stewardship:** We accept the responsibility that comes with processing personal data.

How we collect your data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

- **Information you provide to us directly:** When you visit or use some parts of our websites and/or services we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up, respond to an email offer, join us on social media, take part in training and events, contact us with questions or request support. If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.
- **Information we collect automatically:** We collect some information about you automatically when you visit our websites or use our services, like your IP address, device type, and GPS-based functionality on mobile devices. If you access our services through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this.
We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible (e.g., by personalising the content you see). Some of this information is collected using cookies and similar tracking technologies. Refer to our Cookies section below for more information.
- **Information we get from third parties:** The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data we already hold about you, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or
- in accordance with a legal obligation, or
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you. If you're someone who doesn't have a relationship with us, but believe that an Inugo subscriber has entered your personal data into our websites or services, you'll need to contact that Inugo



subscriber for any questions you have about your personal data (including where you want to access, correct, amend, or request that the user delete, your personal data).

How we use your data

First and foremost, we use your personal data to operate our websites and provide you with any services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

To communicate with you: This may include:

- providing you with information you've requested from us (like training or education materials) or information we are required to send to you
- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services
- marketing communications (about Inugo or another product or service we think you might be interested in) in accordance with your marketing preferences
- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email, in-app support or otherwise.

To enhance our websites and services and develop new ones: For example, by tracking and monitoring your use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

To protect: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our terms of use.

To market to you: In addition to sending you marketing communications, we may also use your personal data to display targeted advertising to you online – through our own websites and services or through third party websites and their platforms.

To analyse, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- other companies in the Inugo group of companies



- third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the website or services, or to market or promote our goods and services to you
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure
- an actual or potential buyer (and its agents and advisors) in connection with an actual or proposed purchase, merger or acquisition of any part of our business
- other people where we have your consent.

International Data Transfers

When we share data, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States, where our data hosting provider's servers are located. These countries may have laws different to what you're used to. Rest assured, where we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens.

Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service you've requested or to comply with applicable legal, tax or accounting requirements).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our internal data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised. Once data is deleted it will no longer be recoverable.

Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication.

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it. Note that deleted data will no longer be recoverable.
- object to our continued processing of your personal data

You can exercise these rights at any time by making a request from the [Contact Us](#) page.



If you're not happy with how we are processing your personal data, please let us know by getting in touch from the [Contact Us](#) page. We will review and investigate your complaint, and try to get back to you within a reasonable time frame.

Cookies

Inugo uses "cookies" in conjunction with our services to obtain information. A cookie is a small data file that is transferred to your device (e.g. your phone or your computer) for record-keeping purposes. For example, a cookie could allow the service to recognise your browser, while another could store your preferences and other information.

We may also use other technologies with similar functionality to cookies, such as web beacons and tracking URLs. These may be used to obtain Log Data that informs whether you have opened a certain message or accessed a certain link. For simplicity, when we refer to cookies we also include these technologies.

Inugo, and our third-party business partners, uses cookies for a number of purposes, such as the following:

1. to enable, facilitate and streamline the functioning of our services across different web pages and browser sessions.
2. to simplify your access to and use of our services and make it more seamless.
3. to monitor and analyse the performance, operation and effectiveness of our services, so that we can improve and optimise it.
4. to show you content (which may include advertisements) that is more relevant to you.

Your browser may allow you to set how it handles cookies, such as declining all cookies or prompting you to decide whether to accept each cookie. But please note that some of our services may not work as intended without cookies.

How to contact us

We're always keen to hear from you. If you're curious about what personal data we hold about you or you have a question or feedback for us on this notice, our websites or services, please get in touch.

As a technology company, we prefer to communicate with you by email – this ensures that you're put in contact with the right person, in the right location, and in accordance with any regulatory time frames.

Contact us at support@inugo.com or the Help section of the software app.