

The Honest Grocer Privacy Policy

This Privacy Policy was last updated on 27 November 2020.

1. Introduction

- 1.1 **Overview:** The Honest Grocer (the **Honest Grocer, us or we**) recognises the importance of protecting your privacy. This Privacy Policy explains how we may collect, hold, use and disclose information that identifies you (your **personal information**). If you would like to contact us in relation to this Privacy Policy or our use of your personal information, please contact us using the details set out in the Contact Us section below.
- 1.2 **Application of this Privacy Policy:** Please read this Privacy Policy carefully. It applies to any personal information that you provide to us or authorise us to collect in connection with our website (available at www.thehonestgrocer.co.nz). By providing us with personal information, or using our website, you authorise us to collect, use and disclose your personal information in accordance with this Privacy Policy.
- 1.3 **Updates to this Privacy Policy:** We may update this Privacy Policy at any time by posting an updated version of this Privacy Policy on our website. The updated version of this Privacy Policy will take effect immediately upon such notice and will apply to all personal information that we hold about you (unless you notify us that you do not agree with the changes). We may also take additional steps to bring the changes to your attention, including by notifying you directly. You are responsible for reviewing this Privacy Policy regularly to ensure that you are aware of any updates. We will update you of any material changes as required by law.
- 1.4 **Additional rights and obligations:** This Privacy Policy applies in addition to, and does not limit, our rights and obligations under the Privacy Act 2020 (as amended or replaced from time to time) (**Privacy Act**) or any additional authorisations that you provide to us when you interact with us or use our services. You are not required to provide us with any personal information that we request. However, if you do not do so, we may not be able to provide certain services to you.
- 1.5 **Important Notice - New Zealand residents only:** Our website is intended for New Zealand residents only. If you are located in another country you may be subject to other laws, including data protection laws. For that reason, if you are not located in New Zealand you are not permitted to use, and must immediately cease using, our website.

2. Collection of personal information

- 2.1 **Types of personal information we collect:** The personal information we collect will vary depending on your interactions with us. For example, we may collect:
- your name, delivery address, telephone numbers and e-mail addresses;
 - information relating to your relationship with us, for example details of your Silver or Gold Membership;
 - any correspondence you have with us, including any feedback that you provide;
 - information relating to your purchases from us and your use of our website;

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- your stated or likely preferences, for example whether you may be interested in particular products or promotions;
- information you provide to enter a promotion; and
- any other information that you authorise us to collect.

2.2 **How we collect personal information:** Generally, we collect personal information directly from you. We may also collect your personal information from a third party if you have authorised them to provide, or authorised us to collect, that information. For example, we collect personal information when you:

- visit our website;
- register for an account and / or upgrade to Gold Membership;
- make a purchase;
- participate in a survey, promotion or competition; or
- communicate with us, including online and with The Honest Grocer Customer Support.

2.3 **Related companies:** We may collect personal information about you from, and share personal information with, our related companies, for the purposes described in this Privacy Policy.

2.4 **Collection of personal information from other sources:** We may collect personal information from other sources, if authorised by you and applicable to a particular service.

2.5 **Information about other people:** If you provide us with, or authorise us to collect, personal information about another person (such as a member of your household), you confirm that you have authority from the relevant individual to disclose their personal information to us and authorise us to collect and use their personal information in accordance with this Privacy Policy. You must inform them of their rights to access and request correction of their personal information in accordance with this Privacy Policy, as set out in section 6 below.

2.6 **Payment card information:** If you make a payment via our website, our payment gateway provider, Stripe, will process your payment. Stripe will process your payment information, in accordance with Stripe's Privacy Policy available at <https://stripe.com/nz/privacy>. Your payment card number is not held by and is never revealed to us.

2.7 **Cookies:** When you use our website, we may also collect the information that does not identify you (or any other individual), such as analytical information about use of our website. When you use our website, short text files called "cookies" may be automatically downloaded to your computer or mobile device. Cookies enable us to provide you with a better experience. For example, by enabling the Website to know that you have visited before and in some cases to record preferences in order to personalise your visit. Cookies also assist us to analyse the profile of our visitors. These can be session cookies which are deleted when you close your browser and / or persistent cookies which remain on your computer or mobile device for a longer period of time. To delete or stop cookies being placed on your computer refer to the help menu on your internet browser. In a few cases, blocking cookies may reduce the functionality of our website or otherwise prevent access to them depending on your chosen browser options. For further information visit www.aboutcookies.org.

2.8 **Website analytics:** We use the services and / or software of the companies listed below to improve our website and analyse its effectiveness. In order for some of this to occur, we use cookies (as referred to above) to count statistics, such as the number of visitors per day, or the number of pages requested per day. This non-personal information is aggregated by the

following companies and enables us to measure activity within our website which in turn is used to continually improve our website and our service to our customers. The companies currently used by The Honest Grocer for website analysis include:

- (a) **Google Analytics:** Google Analytics is viewed as a leader in the internet industry for its interactive measurement technologies and market research and its technologies are viewed as being robust and standard. For further information about Google Analytics, click [\[here\]](#).
- (b) **Dot Digital:** Dot Digital is viewed as one of the leading data management platform providers, used for segmenting customers into audiences for promotional purposes. For further information about Dot Digital, click [\[here\]](#).
- (c) **Hotjar:** Hotjar is viewed as a leader in the internet industry for heat mapping and its technologies are viewed as being robust and standard. For further information about Hotjar, click [\[here\]](#).

2.9 Emails sent on behalf of The Honest Grocer may include code that measures e-mail response and click through activity.

3. Use of personal information

3.1 **Purpose:** We and our related companies may use your personal information for the following purposes:

- for the general operation of The Honest Grocer (or, if applicable, other businesses carried out by our related companies) and our relationship with you - including providing you with products or services that you have requested;
- to process your registration and administer your Membership, including if you enrol as a Gold Member;
- to provide services to you, such as processing and delivering your orders;
- to send you direct marketing, including by email and other electronic means. This may include information about special offers, discounts, promotions and other information relating to our products and services and membership options, or the products and services of our related companies and selected third parties, that we think may be of interest to you – you can **opt out** of receiving direct marketing by using the unsubscribe function of marketing emails, telling us by email or by calling The Honest Grocer Customer Support (refer to the “Contact Us” section below);
- to understand your shopping habits and likely preferences, in order to enhance products and services (for example, in order to offer you a better, more personalised and tailored service, send you information about goods and services that are likely to be of most interest to you and show you advertising and information that is most relevant to you and your interests);
- to improve the services, including the range of services and offerings, provided by The Honest Grocer and / or our related companies generally and to ensure that they remain relevant and of interest to users. For example, we may contact you to request that you respond to market research and surveys and if you contact our call centre we may record your call for quality and training purposes;
- to enter you in a prize competition and administer the prizes;

- to assist you to access new channels for delivery of, and access to, our services, for example mobile applications and payment methods;
- to assist us in investigating your claims, complaints and enquiries; and
- for any other purpose authorised by you or permitted by law.

3.2 **Consent to receiving messages and direct marketing:** When you register to use our website, your name and contact details will be added to our customer database, and you consent to receiving messages from us from time to time (including by email, text and other electronic means). If you provide us with your mobile number, we may send you a text message when your order has been delivered or is ready for pick-up. We may send you messages about promotions available at The Honest Grocer. All electronic communications from us (except for communications confirming your order or otherwise related to your order and your ongoing use of our website) will contain an unsubscribe function that you can use if you no longer want to receive messages from us.

4. Disclosure of personal information

4.1 **Disclosure:** We may share your personal information with the following parties:

- **Related companies:** We may share your personal information with any of our related companies for any of the purposes set out in this Privacy Policy. Our related companies are based in New Zealand.
- **Service providers and suppliers:** In providing and managing our services, we contract with other businesses to provide services to us, and supply products to our customers. We may disclose personal information to our suppliers to enable them to provide services to us. We may also share personal information with our product suppliers and logistics service providers to enable them to deliver products directly to you. We require these service providers and suppliers to adhere to our confidentiality requirements and to the requirements of the Privacy Act.
- **Prize competitions:** Generally, we will never disclose your personal information to our suppliers. The one exception to this is that we may provide your contact details to a supplier, to enable them to contact you if you have won a prize. Please be aware that this may include providing your contact details to a supplier if you have won a prize competition that you were automatically entered into by purchasing an eligible product.
- **Anonymous information:** We may share anonymised and aggregated information (which is not capable of identifying you) with our contractors, affiliates, business partners and other third parties.
- **New partners:** We are focused on continually enhancing The Honest Grocer's products and services and providing new products and services, which may involve new partnerships with other companies. We will only disclose your personal information in connection with new or enhanced products and services after we have given you reasonable notice of our intention to do so via a message on our website or other communication to you, or after you have given us express authorisation.
- **Other Parties:** We may disclose your personal information to any other party authorised by you or to whom we are required or authorised to disclose personal information in accordance with applicable law.

We require any third parties to adhere to our confidentiality requirements and to the requirements of the Privacy Act.

- 4.2 **Overseas transfer:** Some of our service providers may be located outside New Zealand . If we transfer your personal information to a service provider outside New Zealand we will ensure that we continue to comply with this Privacy Policy and the Privacy Act.

5. Storage of personal information

- 5.1 **Storage:** Personal information is generally stored by a cloud storage provider on our behalf. We may also hold some personal information at our head office (refer to the Contact Us section below).
- 5.2 **Security:** Security of your information is very important to us. We will take reasonable technical and organisational precautions, including complying with generally accepted industry standards, to protect personal information that we hold. However, due to the inherent nature of the internet, we are not able to guarantee the security of any information that we hold or that you transmit to us. As discussed above (section 2), if you make a payment via our website, our payment gateway provider, Stripe, will process your payment and your payment card number is never revealed to us.

6. Access and correction of personal information

- 6.1 **Your rights:** Under the Privacy Act, you have the right to access and request correction of any personal information that we hold about you. You can request access to, and correction of, your personal information at any time by contacting us. Please refer to the Contact Us section below. We may charge a reasonable fee for giving access to your information if your request requires substantial effort on our part. Before we provide you with access to your personal information, we may require some proof of identity.
- 6.2 **Updates:** You can also update your details, and change your preferences, on our website by signing into your account or by contract us. We rely on you to update us if your contact details change.

7. Contact Us

If you have any questions or requests relating to this Privacy Policy or personal information that we may hold about you, please contact us using the details below:

Privacy Officer
The Honest Grocer
24A Greenpark Road
Penrose
Auckland – 1061
New Zealand

Phone: (09) 930 8333
E-mail: privacy@thehonestgrocer.co.nz
