

# **Infrastructure Data Privacy Policy**

Lutra Limited (we, us or our) offers a web-based and mobile application software system called Infrastructure Data (ID). ID combines data from various sources and automates reporting for water quality and environmental compliance, treatment plant performance and network demand.

This privacy policy (**Privacy Policy**) has been compiled to inform all clients and users of ID (**you** or **your**) about how your 'Information' is used by us. It defines our practices regarding the collection, use and disclosure of Information that we collect about you.

By accessing or using ID, you agree to this Privacy Policy.

# 1 Information ID collects

In order to allow us to provide and improve ID, we collect certain Information from you and the devices that you use to access ID.

The Information that we collect includes (but may not be not limited to):

- 1.1 Information that you provide to us, including your name and contact details and preferences
- 1.2 Information that we obtain through your use of ID, including your device's information and your location
- 1.3 Your preferences based on previous or current site activity.

We collect this information in the following ways:

- 1.1 Through your use of ID
- 1.2 Through Supervisory Control and Data Acquisition and Programmable Logic Controller systems
- 1.3 When the ID mobile application is used, we collect and process your location. ID has Global Positioning System technology that provides Information on your location, nearby devices, Wi-Fi access points and cell phone towers
- 1.4 Through the use of cookies. If your device allows it to do so, ID transfers cookies to its hard drive through your web browser. These cookies enable ID's (and/or its service provider's) systems to recognise your browser and capture and remember certain Information. Cookies are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. ID also uses cookies to help us compile aggregate data about site traffic and site interaction so that we can offer you better site experiences and tools in the future.

ID does not use vulnerability scanning and/or scanning to Payment Card Industry Data Security Standard, and we will never ask about any payments.

## 2 Use of Information

ID uses the Information it collects from you to provide, computerise, visualise, and improve the service it offers you, as well as to provide you with tailored content. It does so in the following ways:

2.1 When logging into ID, your identity will be verified prior to enabling ID.



- 2.2 When you enter, and browse data, and create or edit objects in ID, ID will provide the appropriate right to operate limited functions based on your Information.
- 2.3 Your Information may be used for the purposes of aggregation, bench marking or other related activities.
- 2.4 ID also uses Information collected from cookies and other technologies, like pixel tags, to improve user experience and the overall quality of services. Information will not be used for any other purpose other than that set out in this Privacy Policy without prior approval from you.

#### 3 Information we disclose

We do not sell, trade, or otherwise transfer your Information to third parties without your consent. This excludes the necessary sharing of Information to website hosting partners and other parties who assist in operating ID's website or mobile application, conducting our business, or serving our users, so long as those parties agree to keep your Information confidential. We may release Information when its release is reasonably necessary to comply with any laws, enforce our site policies, or to protect ours or others' rights, property or safety.

## 4 Information security

Your Information is contained behind secured networks and is only accessible by a limited number of parties who are authorised to browse and/or modify the Information. These parties are required to keep your Information confidential.

ID uses a variety of security measures to maintain the safety of any Information that you enter, submit, or access.

ID has been reviewing, and will continue to review, its Information collection, storage and processing practices, including physical security measures, in order to guard against unauthorised access to its systems.

ID has established procedures to prevent information security incidents and accidents, restrict access to Information that is subject to strict contractual confidentiality obligations, and to thoroughly enforce the operation of these practices, thereby preventing the occurrence of information security incidents and accidents in advance.

# 5 Privacy Policy applies

This Privacy Policy applies to all ID services including the mobile and the web-based services. This excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

This Privacy Policy does not apply to services offered by other companies or individuals, other services that we offer. This includes sites or mobile applications that may be displayed to you in search results, or sites that may include or display ID.

#### 6 Your rights

You have the right to:

• ask us whether we hold personal information about you;



- access any information that we hold about you; and, if applicable
- request corrections to that information.

If we have a good reason for refusing a request for correction, you are entitled to request that a statement be attached to the information of the correction that was sought but not made.

If you would like to check the personal information that we hold in relation to you, or you have any questions regarding this Privacy Policy, please email us on:

support@infrastructuredata.co.nz

## 7 Privacy Policy Changes

We may change this Privacy Policy from time to time by posting the updated version to the Support url or otherwise providing notice to you. If you do not agree with the change you must stop using ID. If you continue to use the ID following a change to this Privacy Policy you will be deemed to have accepted the change.

This Privacy Policy was last reviewed on 9 December 2020.