

PRIVACY POLICY

Pivotel New Zealand Limited

Pivotel New Zealand Limited (**'Pivotel'**) is a mobile satellite telecommunications company offering value for money communications services differentiated by the high quality of our customer service and our operational excellence.

Pivotel owns and operates the Globalstar mobile satellite telecommunications business in New Zealand, and we resell Inmarsat, Iridium and Thuraya mobile satellite services. We also offer Personal Communication Services and Tracertrak Internet based remote asset management and monitoring services.

We are Committed To Protecting Your Privacy

Pivotel is committed to protecting the privacy of your personal information.

We Comply With New Zealand Privacy Laws

Pivotel is bound by and complies with the telecommunications privacy rules set out in the *Telecommunications Information Privacy Code 2003*, the *Privacy Act 1993*, and the *Telecommunications Act 2001*.

How to Contact Us

You can contact Pivotel by ringing our Customer Care team on 0508 882 448, or by sending an email to mail@pivotel.co.nz. If you need to write to us, our contact details are:

Pivotel New Zealand Limited
15 Te Puni Street
Petone 5012
PO Box 38-415 WMC 5045
New Zealand

Our Purpose for Collecting Your Personal Information

Pivotel collects personal information about you for the purpose of providing you with personalised mobile communication services.

The collection of this personal information allows us to provide a responsive and informed customer care service, to issue you with accurate and personalised bills, and enables us to enhance and tailor our products and services to meet your needs.

Types of Personal Information We Collect

We may collect the following types of personal information:

- names;
- addresses;
- telephone numbers;
- email addresses;
- service details (eg. service type, location, date, time, duration of calls, volume of data sent or received, called numbers, expenditure etc)
- personal preferences; and
- contact histories.

How We May Use Your Personal Information

In order to provide personalised wireless communication services to you, we may use your personal information for a number of purposes connected with our business. These purposes include:

- processing your order for Pivotel products and services;
- conducting credit checks and credit scoring activities;
- providing you with the products and services you have ordered from us;
- preparing and issuing your bills, and collecting the money you have spent on Pivotel products and services;
- updating and administering your account details;
- dealing with your requests, enquiries or complaints and any other customer care related activities;
- marketing our products, and carrying out market, product and service analysis activities generally;
- registering your details and fulfilling any requests or requirements you may have in relation to competitions, promotions, rewards, discounts, loyalty schemes or any other benefits available to you as a customer;
- carrying out any activity required by, or authorised by the government or any legal or regulatory authority in connection with our business generally, or specifically in connection with any legal proceedings, crime, fraud or other unlawful activity prevention, detection, investigation or prosecution; or
- any other purpose related to the purposes described above and which would be reasonably expected by you.

Our Privacy Commitment to You – Use of Personal Information

We will not use your personal information for any other purpose other than those purposes described above without your consent, unless there is a specified legal, law enforcement, or public health and safety issue involved.

When We May Disclose Your Personal Information

We may disclose or share your personal information, or receive personal information about you from:

- credit providers or credit reporting agencies for the purposes permitted under the *Privacy Act 1993*;
- law enforcement agencies to assist in the prevention, detection, investigation or prosecution of criminal or other unlawful activities; and
- our dealers, distributors and agents, our network carrier and mobile satellite service partners located in Australia and overseas, or any other Pivotel related company for purposes that are connected with providing you with mobile communication services, and with which you would reasonably expect us to disclose, share or receive personal information about you.

Credit Related Information

When we collect personal information about you that we are likely to disclose to a credit reporting agency, you should be aware of the following matters:

- the credit reporting agency may include your credit information in reports provided to service providers to assist them to assess your credit worthiness;
- if you fail to meet your payment obligations in relation to consumer credit provided by us or commit a serious credit infringement, we may be entitled to disclose this to the credit reporting agency;
- you may obtain our policy about the management of your credit related personal information, and you can access the credit reporting agency's policy about the management of credit related personal information by contacting the credit reporting agency;
- you have a right to access your credit information from us, and to request us to correct that information;
- you can make a complaint to us and we will handle your complaint in accordance with our complaints handling policy;
- you have a right to request the credit reporting agency not to use your credit reporting information for the purposes of pre-screening of direct marketing by a service provider; and
- you have right to request the credit reporting agency not to use or disclose credit reporting information about you, if you believe on reasonable grounds that you have been, or is likely to be, a victim of fraud.

Pivotel works with Equifax (www.equifax.com.au) as a credit reporting agency. Equifax's website gives their contact details and their policies about the management of your personal information.

Our Privacy Commitment to You - Sharing Personal Information

We will not disclose or share your personal information with third parties for any other purpose other than those described above without your consent, or where there is no specified legal, law enforcement or public health and safety issue involved.

We will not share or disclose your personal information to third parties unless you have consented to us disclosing or sharing your personal information with them, or they have contracted with us to protect your personal information, or they are themselves obligated to protect your personal information.

Quality and Security of Personal Information

We will take reasonable steps to ensure your personal information is accurate, complete and up-to-date, and we will take reasonable steps to protect your personal information from unauthorised access, modification, or disclosure.

Where we no longer need your personal information for a purpose described above, we will take reasonable steps to destroy or otherwise remove your identity from that information.

Access to Your Personal Information

You can request us to provide you with access to your personal information, or to provide you with a copy of this Pivotel Privacy Policy which sets out, generally, what sort of personal information we hold, and for what purposes we collect, hold, use or disclose that personal information. Requests for access to this Privacy Policy or to your personal information can be made by telephoning our customer care team on 0508 882 448 or by sending an email to mail@pivotel.co.nz.

Upon your request, we will take reasonable steps to provide you with access to your personal information unless there is some legal, law enforcement, public health and safety or specified business issue involved.