

Privacy Policy

NZ Electronic Shelf Labelling Limited (NZESL)

OZESL Pty Ltd (OZESL)

1. Introduction

This Privacy Policy explains how NZ Electronic Shelf Labelling Limited (NZESL) and its Australian subsidiary OZESL Pty Ltd (OZESL) ("we", "us", "our") collect, use, store, and protect personal information in the course of supplying electronic shelf labelling hardware, software, and related services to business customers.

We operate exclusively in a business-to-business (B2B) context. This policy applies to information relating to our customers, their personnel, and other business contacts.

By engaging with us or entering into any agreement with NZESL or OZESL, you agree to the practices described in this Privacy Policy.

2. Definitions

- **Personal Information** means information about an identifiable individual, including business contact details.
- **Customer** means any business entity that purchases hardware, software, or services from NZESL or OZESL.
- **Pricer** means Pricer Aktiebolag, our technology partner and provider of the Pricer software platform.
- **Services** means installation, support, maintenance, and related services provided by NZESL or OZESL.
- **Software** means the Pricer software and any related systems used to operate electronic shelf labels.
- **Asia-Pacific Region** means cloud hosting regions located within the Asia-Pacific geographic area.
- **Subcontractor** means any third party engaged by NZESL or OZESL to assist in delivering the Services.
- **You** means the customer or the customer's personnel whose information we process.

3. Information We Collect

3.1 Business Contact Information

- Names, job titles, phone numbers, email addresses
- Contact details for project managers, technical staff, and store personnel

3.2 Operational and Installation Information

- Store locations and site access details
- Installation notes, deployment records, and configuration information
- Support tickets, service logs, and maintenance records

3.3 Technical and System Data

- Device identifiers and ESL network information
- Diagnostics, performance data, and usage information generated by Pricer systems
- System access logs and authentication data

3.4 Financial and Credit Information

- Billing and invoicing details
- Payment history
- Credit-check information (Australia only, as authorised under the OZESL Sale & Purchase Agreement)

3.5 Communications

- Emails, meeting notes, project documentation, and correspondence
- Information provided during support interactions

4. How We Collect Information

We collect information through:

- Direct interactions with customer personnel
- Contracting and onboarding processes
- Installation, support, and maintenance activities
- Automated system logs generated by Pricer software
- Third-party credit agencies (Australia only)
- Communications via email, phone, or online forms

5. How We Use Information

We use information to:

- Supply, install, and support electronic shelf labelling hardware
- Provide access to and support for Pricer software
- Manage Statements of Work and project delivery
- Communicate with customer personnel
- Process payments, invoices, and account management
- Conduct credit checks and assess creditworthiness (Australia only)
- Improve our services and operational processes
- Meet legal, regulatory, and contractual obligations

We do not use personal information for unrelated secondary purposes.

6. Sharing and Disclosure of Information

6.1 Pricer

We may share information with Pricer for:

- Software hosting
- System support and diagnostics
- Maintenance and updates

Pricer operates under its own privacy and security frameworks.

6.2 Subcontractors and Service Providers

Including:

- Installation partners
- Logistics providers
- IT and systems support vendors

All subcontractors are required to comply with confidentiality and security obligations equivalent to those in our customer agreements.

6.3 Credit Reporting Agencies (Australia Only)

As authorised in the OZESL Sale & Purchase Agreement, we may:

- Request credit information
- Provide details of credit performance

6.4 Professional Advisers

Such as lawyers, auditors, and accountants.

6.5 Legal and Regulatory Authorities

Where required by law, court order, or regulatory obligation.

We do not sell personal information.

7. International Data Transfers

To deliver our services, customer information may be stored or processed in cloud infrastructure located in the Asia-Pacific region, and may be accessed by authorised personnel in:

- New Zealand (NZESL)
- Australia (OZESL)
- Sweden (Pricer support and engineering teams)

We ensure that any overseas recipients provide privacy protections comparable to those required under the New Zealand Privacy Act 2020 and the Australian Privacy Principles.

8. Data Security

We take reasonable technical and organisational measures to protect information, including:

- Access controls and authentication requirements
- Secure cloud hosting environments
- Encryption and secure transmission protocols (where applicable)
- Confidentiality obligations for employees and subcontractors
- Monitoring, logging, and incident-response processes

9. Data Retention

We retain information only for as long as necessary to:

- Deliver our services
- Meet contractual obligations
- Comply with legal, financial, and audit requirements

Upon request, and subject to legal retention obligations, we will return or securely destroy information. Backup copies may persist until overwritten in the normal course of system operation.

10. Your Rights

Depending on your jurisdiction, you may have the right to:

- Access personal information we hold
- Request correction of inaccurate information
- Request deletion of information (subject to legal retention requirements)
- Request information about how your data is handled

Contact us to exercise these rights.

11. Changes to This Policy

We may update this Privacy Policy from time to time. The updated version will be published on our website.

12. Contact Us

New Zealand (NZESL)

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Australia (OZESL)

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