



Sugar Wallet Privacy Policy

Privacy Policy

Overview

We care about your privacy. And we've designed our services with your privacy in mind.

This policy covers the services that are offered by Sugar Limited, when we interact with you through our website, app or otherwise in connection with your account with us.

We want you to understand what personal information we collect and store about you, what we will do with that information, and who we might share that information with. That's what this privacy policy covers.

Please read this privacy policy alongside our [Terms of use](#)

1. About us

We are Sugar Limited (Sugar), a company incorporated in New Zealand. Our company number is 8069156 and our registered office is at Suite 14278, 17b Farnham Street, Parnell, Auckland, 1052, New Zealand

If you have any questions about this privacy policy, please contact us at hello@sugarwallet.com

2. What this policy means

In this policy, when we say 'we', 'us', and 'our', we mean Sugar Limited.

We care about the privacy of our users of www.sugarwallet.co.nz (our '**website**') and our services.

This policy tells you:



- what information we might collect about you – from you and others;
- how we might use that information;
- where we store that information; and
- who we might share your information with.

When we say ‘New Zealand privacy law’, we mean the law in New Zealand that covers personal information that’s in force at the time that you use our services. This includes codes of conduct issued by the Privacy Commissioner.

When you use our services, you acknowledge that we may collect, use, store, and share your information as we’ve described in this policy.

3. What information we collect

We may collect the following information from you when you use our website or when you use our services.

Personal information collected	When collected	Why collected
Your name and contact details	When you register to use our services, create an account, or when you otherwise provide it to us (for example, on the various contact forms on our website)	So that we can identify you, communicate with you, and provide you with information
Your bank account details	When registering during signup via Akahu	So that we can deduct your recurring deposits & so that we comply under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009
Information relating to your use of the website such as device related information (IP address) and pages visited.	When you use our services	So that we can provide our services to you, personalise those services and assist our software function.



All personal information we collect about you, including the above. We also collect	The circumstances described above, and otherwise during your interaction with us	For the purposes set out in paragraph 9 and 10 and as otherwise set out in the Policy
information you input into the website		

You don't have to give us your information. But if you do not provide us with information, we may not be able to provide you with our services.

4. Information others give us

We might receive your personal information from third-party websites or services, such as Facebook, Twitter and Google Analytics, who you have authorised to disclose your personal information to us. The collection and disclosure of that personal information by those third parties will be governed by terms you have agreed with them, and the New Zealand Privacy Act 2020.

5. Information you give us about other people

We may collect information about someone else from you, if you provide that information to us. If you do provide us with someone's personal information, you must make sure you have that person's authority to do so and you must make sure that person knows that their information may be used by us in the circumstances set out in this policy.

6. Additional collection

We may gather more extensive information about your interactions with our website or with us generally, if we are concerned about abnormal website usage patterns or potential security breaches.

7. Collection and deletion of bank account details



We collect your bank account details via Akahu so that you can use your 'Wallet' for our services.

If we don't have your bank account details, we can't offer our services to you.

8. Cookies

Cookies are pieces of information that are automatically downloaded to your computer or mobile device when you use a website.

We use cookies for a few different reasons. Cookies make it easier for you to use our website in future visits (by remembering who you are). Cookies also help us to monitor traffic and personalise the content on our website for you.

We can't use cookies to view any data on your device – only data stored in the cookie.

Some parts of our website can't work without these cookies so we've automatically turned them on. You can switch off cookies and other tracking services using your browser settings (but it might mean you can't use our website in the same way).

Specifically, we may use the following kinds of cookies:

- strictly necessary cookies (which let you use our services);
- performance cookies (which gives lets us know if our services are working and helps us to fix errors);
- functionality cookies (which helps us to personalise your visit);
- persistent cookies (which stay on your device after you've left our website, so that we can remember you for next time);
- session cookies (which last only for the duration of your visit);
- advertising cookies (which allow us to show you specially targeted ads).



To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

10. **Other use**

We only use your information in the way described in this policy, or if New Zealand law says it's fine to do so.

We've outlined the specific ways we'll use your information above (see paragraph 2).

We might also use your personal information to:

- respond to your enquiries and communicate with you;
- assist our software to function and help us debug or fix software problems;
- support you in using our services;
- provide you with important notices and information about our services;
- provide you with other information (including promotional material, news, and event information) where you agree to receive such information; and
- improve the functionality of our website, including testing new or modified functionality.

We might also combine data or information that we have collected about you ourselves, with the information we collect from others for the purposes described in this policy. This data, once aggregated, will in no way identify you or any other individual.

11. **Where your personal information is held**

The personal information that we collect about you is securely hosted on our servers with Amazon Web Services.

Data, which may also include a back-up of our data, including any personal information that we collect in respect of you, is held on servers maintained by a third party.

12. **Sharing your information with others.**



We can only share your information in the way described in this policy, or if New Zealand privacy law says it's fine to do so.

We've described the ways we disclose your information to some specific third parties above for example, as described in paragraph 9.

In order to offer you our services, we will disclose your personal information to:

- the custodian who holds the funds invested by you through our services, who is Sugar Nominees Ltd.

The administrator and custodian may also be required to use your information as outlined in this policy to comply with legal or tax reporting obligations. The identity of the administrator and/or the custodian may change, in which case we will need to disclose your personal information to a new administrator or custodian. We will let you know if this happens.

We might also disclose your personal information to:

- our professional advisors, contractors, service providers, business associates, related companies, and others who have agreed to treat your personal information in accordance with this privacy policy;
- entities who carry out services on our behalf (for example, by sending communications to you, such as Intercom)

13. **What we won't do with your information**

We will never sell your personal information to others.

We will not otherwise use or disclose your personal information except:

- for any purpose set out in this privacy policy, or a purpose that is closely related to it;
- where New Zealand law requires or permits us to do so;



- where you have otherwise authorised us to do so; or
- where we believe that we need or should disclose your information to other organisations under New Zealand law, or if we need to protect you or other people from harm.

14. **How to access and correct your information**

It is important to us that the personal information we hold about you is accurate, complete and up to date.

To help us ensure that's the case, you can:

- ask us what personal information we hold about you; and
- ask us to correct your personal information.

We may need to obtain personal information from you to identify you and verify that it is in fact you who is seeking access to your personal information.

If you'd like to do so, please contact our privacy manager (see their contact details below). We might ask you to put your request in writing. Depending on the circumstances, we can also ask you to pay a reasonable fee.

Sometimes, we might not be able to help (like if we can't under the law or doing so would prejudice our commercial interests) but only if we are permitted to not give you access, or correct your information, under New

Zealand law. And we'll always tell you why we've made that decision and what your options are.

You can contact our privacy manager by emailing hello@sugarwallet.com

Keeping us updated

We need to make sure that the contact, payment, and tax information we hold about you is accurate and current. There may be negative consequences for you if you fail to do so – for example, you may be liable for additional tax if you have not provided us with updated tax information. So please



advise us of all necessary changes to such information as soon as possible.

15. **Retention period**

We can only hold personal information we collect about you for as long as is necessary to provide our services to you. So we securely remove any personal information that we no longer need.

If you cancel your account with us, we will retain your account information unless you request that we delete it from our system.

You can send requests to our privacy manager by using our contact details set out above.

16. **Third party websites**

This privacy policy doesn't cover your use of others' services. And we can't control what information third parties collect and how they use your information. So when you follow a link on our website, you should read the privacy policy for that website as well.

17. **Changes to our privacy policy**

What information we collect and how we use that information can change. So we might need to update this privacy policy from time to time to reflect those changes.

You should check back here for any changes. We'll tell you when we last updated the policy at the top of the page.