



HORIZON ENERGY GROUP PRIVACY POLICY

Horizon Energy Group Limited and its related companies including Aquaheat New Zealand Limited, Aquaheat South Pacific Limited, Aquaheat Facility Services Limited, Caldwell and Levesque Limited, CoolLogic Refrigeration Limited and Horizon Services Limited (we, us, our, Horizon Group) provide products and services in the electrical, mechanical, refrigeration and infrastructure services sectors. We work in range of environments, including heating, ventilation and air conditioning, refrigeration, electrical, plumbing, milking and pumping solutions, carpentry, metal roofing / cladding manufacture and installation. We are fully committed to ensuring that the way in which we receive or collect and handle personal information complies with the Privacy Act 2020, including the personal information of our customers, contractors and those members of the wider community who we interact with in the course of our business operations.

1. INTRODUCTION

1.1 Overview

This Privacy Policy applies to all Horizon Group entities in New Zealand with the exception of Horizon Energy Distribution Limited (our related electricity distribution company) and Horizon Services Limited when it is acting in its capacity as provider of maintenance services to Horizon Networks. 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 information, please email us at the details set out in the Contact us section below. If you interact with Horizon Networks, or Horizon Services Limited in its capacity as provider of maintenance services to Horizon Networks, then please refer to the separate Privacy Policy set out on our website: www.horizonnetworks.nz, under Legal.

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. By signing up (either personally or on behalf of the organisation you work for) as a customer, becoming a contractor or supplier to us, visiting our premises or a site that we are responsible for, accessing our websites or otherwise providing us with personal information, 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 websites. The updated version of this Privacy Policy will take effect immediately upon such notice. We may also take additional steps to bring the changes to your attention, including by notifying you directly. 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 specific authorisation that you provide to us when you interact with us.



2. COLLECTION OF PERSONAL INFORMATION

2.1 Types of personal information we collect

The personal information we collect will depend on your interaction with us. The personal information we commonly collect includes:

Customers

Customer profile and contact information	including individual's name, role title, address, company, telephone number and email address
Credit worthiness	in relation to individuals named in credit application forms submitted on behalf of customer organisations, including identification details (including name, date of birth and address) and credit history
Property information	including customer site photographs, customer site or house plans and property asset information including asset type, model, make, location, and condition rating
Records of individual service interactions	including when you make a service call and information generated through our regular client insights survey programme

Contractors and Suppliers

Contractor / supplier profile and contact information (including potential contractors / suppliers)	including individual's name, role title, address, company, telephone number, email, account information, qualifications and information from identification documentation (such as driver's licences)
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Websites

Technical information	information relating to your interaction with our websites that we automatically collect when you access or use our websites (e.g. IP address, browser type, cookie information region browsing behaviour website analytics).
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Community

Site visitor information	including individual's name, company, signature, and other basic identifying information entered in a visitor or site log when you visit our premises or a site that we are responsible for
Contact Information	basic contact information when you make an enquiry through our websites or by telephone or email

2.2 What happens if you do not provide us with personal information

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 services to you, open credit accounts for you (or the organisation you own or work for), engage you (or the organisation you work for) to provide services to us or respond to your queries or complaints. We'll let you know if this is the case.



3. HOW WE COLLECT PERSONAL INFORMATION

Generally, we collect personal information directly from you. We do this through application forms, our regular customer surveys, paper-based logbooks, phone calls to our call centre and websites enquiry forms.

We also collect information about your credit history from credit reporting agencies (such as CreditWorks Data Solutions Limited).

We may also collect your personal information from other third parties if you have authorised them to provide, or authorised us to collect, that information, including from:

- your trade references;
- contractors, builders and subcontractors to us;
- your insurance company (when processing charges for replacement assets or damage in a car versus pole accident).

We may also collect information about you and your use of our websites through the use of automatic data collection tools. These tools collect certain standard information about your access and computer, such as your browser type, operating system and language, access times and your Internet Protocol (IP) address.

Cookies: We may also collect information through cookies on our websites. Cookies are small pieces of information that are stored on a user's computer. We may use cookies to personalise your experience on the websites, make it easier for you to navigate our websites, and improve your experience by storing your search, login details and order history. Cookies can be disabled via your web browser; however doing so may limit your access to some of the websites' content and features. We may also use cookies to track non-personally identifiable information such as usage and volume statistics, for research purposes in order to further develop our websites.

Information about other people: If you provide us with, or authorise us to collect, personal information about another person, you confirm that they have authorised you to provide us, or authorise us to collect, their personal information in accordance with this Privacy Policy and that you have informed them of their rights to access and request correction of their personal information, as set out below.

4. USE OF PERSONAL INFORMATION

We may use your personal information for the purposes set out below:

4.1 Customers

to determine whether to open a credit account in the name of, and from time to time, to determine whether to continue offering credit to, a credit applicant and to register any security interest granted by a credit applicant to us and for debt recovery;

- to provide quotations and proposals;
- to deliver and invoice for our services;
- to contact you regarding services, answer your questions and otherwise manage our relationship with you;
- to assist the business development / sales function of our business;
- to understand you better (through our regular customer surveys);
- debt recovery;
- to market our products to you (e.g. via newsletters or other marketing materials) unless you have opted-out of such marketing; and
- to analyse your use of our websites, personalise and improve your experience on our websites using cookies and similar technologies.



4.2 Contractors and Suppliers

- to assess tenders and proposals, including for the ability to do a job safely, reliably and efficiently;
- to carry out supply chain due diligence;
- to interview and consider prospective contractors;
- to instruct, engage and pay for services;
- to fulfill our site health and safety responsibilities; and
- to contact you and your team.

4.3 Websites Visitors

- to analyse your use of our websites, personalise and improve your experience on our websites using cookies and similar technologies; and
- to respond to your website enquiry.

4.4 Community

- to fulfil our site health and safety responsibilities; and
- respond to enquiries made by you.

4.5 Generally

- to facilitate our internal business operations (including personnel training and quality control); and
- for any other purpose authorised by you or permitted by law.

4.6 Use of aggregated and anonymous information

- We also use aggregated and anonymous information (where identifiable characteristics are removed, so that you will remain anonymous) for statistical and research purposes.

4.7 How we may communicate with you

- We may communicate with you by email and other electronic means.

5. DISCLOSURE OF PERSONAL INFORMATION

5.1 How we may share your information

We may share your personal information for the purposes set out in this section and in section 4 above with the following parties:

- Horizon Energy Distribution Limited who may use and disclose your personal information for the same purposes as us;
- credit reporting agencies (such as CreditWorks Data Solutions Limited) and debt collection agencies;
- contractors and suppliers to assist us with the operation of our business;
- our customer survey provider and other IT service providers for the purpose of processing, hosting or storing information on our behalf;
- authorities, regulators and professional advisers (including lawyers, bankers, auditors and insurers);
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets;
- to whatever party as may be necessary to lessen a serious threat to a person's health or safety or to assist with any request from Worksafe, the Ministry of Health or the District Health Board in relation to contact tracing for Covid-19; and



- any other party authorised by you or to whom we are required or authorised to disclose personal information in accordance with applicable law.

6. SECURITY AND STORAGE

6.1 Security

We take reasonable technical and organisational security measures to prevent loss or unauthorised access, use, alteration or disclosure of personal information you provide to us or authorise us to collect. We also require any third parties, such as contractors, service providers and credit reporting agencies, who require access to your information to implement reasonable technical and organisational security measures to protect your information.

6.2 Inherent risks

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will apply our normal procedures and comply with legal requirements to protect your information, we cannot guarantee the security of your information transmitted to or from the websites and any transmission is at your own risk.

6.3 Links to third party websites

Our websites may from time to time contain links to and from other websites. If you follow a link to any of those sites, please note that those sites ought to have their own privacy policies and that we do not accept any responsibility or liability for those sites or for their privacy policies. Please check those privacy policies before you submit your information to those sites.

7. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Your rights: Under the Privacy Act, you have the right to obtain confirmation that we hold personal information about you, and to access and request correction of any such personal information. Please refer to the Contact us section below.

8. CONTACT FOR FURTHER INFORMATION

How to 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 on:

- a) **Address:** Horizon Energy Group, PO Box 281, Whakatane 3158, Attention: Privacy Officer
- b) **Email:** privacy@hegroup.nz