



# PRIVACY POLICY

Flick Energy Limited ("Flick") is committed to complying with the Privacy Act 2020 and to adopting the highest standards to safeguard our customers' personal information. This Privacy Policy sets out why, how and what personal information we collect, and how we hold, use, disclose and keep secure your personal information.

This Privacy Policy applies to Flick customers as well as to users of the Flick app and visitors to our website as relevant.

Further information about privacy and your rights under the Privacy Act can be found at the Privacy Commissioner's website: [www.privacy.org.nz](http://www.privacy.org.nz)

## 1. Why and how we collect your personal information

When you use our website or social media channels, while you are applying to be, and while you are a Flick customer (includes users of the Flick App) we will collect and hold personal information about you. We collect your personal information in order to be your electricity retailer and for related purposes. Flick may collect information directly from you (including through our agents), via our website, social media channels or call centre and from third parties who are involved in your electricity supply (such as your network company, meter equipment owners and your previous retailer through the Electricity Registry: [www.ea.govt.nz/industry/retail/electricity-registry](http://www.ea.govt.nz/industry/retail/electricity-registry)).

## 2. What personal information we collect

### Personal information:

We will need to collect personal information in order to be your electricity retailer, including, without limitation, your name, address, date of birth, contact details, information about your property, and information regarding your electricity consumption at your property. Where applicable, we may also collect personal information from you in relation to assisting us with carrying out our responsibilities under the Electricity Authority's requirements/Guideline on Arrangements to Assist Vulnerable and Medically Dependent Consumers. More information on these can be found here: [www.ea.govt.nz/your-power/consumer-care](http://www.ea.govt.nz/your-power/consumer-care)

We will also need to collect personal information such as your email address in order to provide you with the Flick App.

### Smart meter data:

You will need to have a smart meter at your property to be our customer. Smart meters are different from analogue meters in that they record electricity use in half-hour periods (rather than simply recording total electricity consumption). When smart meter consumption data is linked to your personal information then it also becomes personal information. We treat smart meter data, like all personal information, in accordance with this Privacy Policy.



### **Cookies and remarketing tools:**

A cookie is a small piece of information stored on your computer or portable device. Cookies are used to identify a computer, not to identify individuals. Cookies help us improve your user-experience when you use our website. The technology we use mostly uses "session" cookies. Session cookies expire after 30 minutes of no activity on our website. However, some cookies we use for internet statistics or remarketing may last longer. Cookies cannot damage files, nor can they read information from the hard drive of a computer. It is possible to disable the acceptance of cookies by your web browser.

We may use remarketing services such as Google AdWords, Bing Ads and Facebook Adverts to advertise on third party websites (including Google, Bing and Facebook) to previous visitors to our site. This could be in the form of an advertisement on the Google or Bing search results pages, on Facebook or on a site in the Google Display Network or other sites through the DoubleClick Campaign Manager. Third-party vendors, including Google, Bing and Facebook, use cookies to serve ads based on someone's past visits to our website.

These services may include Google's 'Customer Match' and Facebook's 'Custom Audience' to display ads. These services allow us to ensure that the ads delivered to you are more relevant to you (i.e. we don't want to show you advertisements inviting you to sign up with Flick if you're already a Flick customer, but we may wish to alert you to products or services that we think might be useful to you). If you have provided us with certain information such as your email address, we may upload it to Google AdWords and Facebook Adverts in an anonymous format to allow them to perform these services on our behalf. Your information is shared with Google and Facebook in a secure way that means no personal information is released at any time.

We may also use Google Analytics Demographics and Interest reporting to allow Google to collect information such as age bracket and interests to help serve you with more relevant content (such information attaches to your email address in an anonymous format).

Any data collected will be used in accordance with this Privacy Policy and the privacy policies of other third-party vendors.

You can view the third-party vendor privacy policies here:

- Google: [policies.google.com/privacy](https://policies.google.com/privacy)
- Bing: [privacy.microsoft.com/en-gb/privacystatement](https://privacy.microsoft.com/en-gb/privacystatement)
- Facebook: [www.facebook.com/privacy/policy](https://www.facebook.com/privacy/policy)

You can set preferences for how these third-party vendors advertise to you using their Ad Preferences pages, refer to below links:

- Google: [myadcenter.google.com](https://myadcenter.google.com)
- Bing: [account.microsoft.com/privacy/ad-settings](https://account.microsoft.com/privacy/ad-settings)
- Facebook: [accountscenter.facebook.com/ad\\_preferences](https://accountscenter.facebook.com/ad_preferences)

If you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin. You can also use the Network Advertising Initiative opt out page: [optout.networkadvertising.org](https://optout.networkadvertising.org) to opt out of receiving this kind of advertising from participating advertisers and advertising platforms.



#### **Website statistics:**

To help us analyse use of our website and to help us understand how our site is working and how we could improve it and/or our services, we use services such as Google Analytics and Hotjar. These analytical tools use a range of techniques including cookies to collect standard web log information and visitor behaviour information in an anonymous form. The information collected about your use of the website includes your IP address, mouse clicks, mouse movements, scrolling activity, text you type into the website, information regarding pages visited, actions which are taken, country, device used, operating system, and browser used. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity.

While we may publish aggregated information of this sort, we will not publish information about individual devices, browsers and users, and we only disclose and use it as set out in this Privacy Policy. This includes disclosing it to the Police or other Government authorities if we think we are obliged to by law.

If you type personal information into our website, this may be recorded by Hotjar (even if you do not submit such information). Hotjar will store such browsing session information subject to its Privacy Policy (you can view this here: [www.hotjar.com/privacy](http://www.hotjar.com/privacy)). We will only access the information Hotjar stores about you to analyse use of our website. We will not use any personal information collected by Hotjar, or any other analytics provider, for any other purpose.

Information that is collected through the Google Analytics service is transferred to Google and stored in accordance with Google's Privacy Policy (you can view this here: [safety.google](https://policies.google.com/privacy)).

If you wish to opt out of Google Analytics, visit [www.google.com/analytics](http://www.google.com/analytics). If you wish to opt out of Hotjar, visit [www.hotjar.com/opt-out](http://www.hotjar.com/opt-out). For more information, please contact us at [hello@flickelectric.co.nz](mailto:hello@flickelectric.co.nz).

#### **Other website information we collect:**

We may also collect other information to help us improve our services. For example, if you post messages directly or indirectly to our website or elsewhere (including our Facebook page or other social media), we may collect and keep the information in those messages.

If you enter your details to sign up on our website but you do not successfully complete the sign-up process, or your application for electricity supply is declined, we may contact you to see if we can help you finish signing up and/or to get your feedback. If we do this, we will use the personal details you have entered on the sign up page to contact you. We may also retain any information supplied by you in our database.

### **3. Use of your information**

The information we hold about you and your property will be used by us (or in some cases by our agents) to provide our services to you and for related purposes, including the following:

- confirming your identity;
- assessing your creditworthiness;
- supplying you with electricity and other services you have requested;
- improving customer service;
- communicating with you, including communicating offers or new plans that may be of interest to you (if you have not opted out of these communications);
- complying with our obligations to you and other third parties involved in the supply of electricity to you and your property;
- providing you with information on relevant third party products and services (if you have not opted out of these communications);
- improving our product offering.
- debt collection.

Flick will not sell or otherwise disclose your personal information to any other person or entity except as set out in this Privacy Policy.



#### 4. Disclosure of your information

Flick will not share your personal information, except when:

- you agree that we can;
- we reasonably believe we are required or permitted to do so by law or industry codes and standards;
- we want to carry out a credit check to consider your creditworthiness. The credit agency may use or disclose any information you provide to others using their services. You can ask the credit agency for a copy of the information they hold about you;
- we need to do so to supply electricity to you or it is a matter covered by our terms and conditions;
- we want to recover money from you when you have not paid us, or if we want to list any payment defaults with a credit agency;
- you are switching to another electricity supplier;
- the network company has requested the information or we are obliged to provide it to them;
- the metering equipment provider has requested information in order to contact you in relation to metering equipment installed or to be installed on your property;
- if we believe that the disclosure is reasonably necessary to enforce any legal rights we may have, or is reasonably necessary to protect the rights, property and safety of us, our customers, or others;
- it is necessary to assist an adjudicator to resolve a complaint you make about us.

We may also share your information with our agents or services providers, for example our credit checking or debt collection agencies, our after hours customer services provider, marketing services providers, website analysis providers, and Z Energy, from time to time in order for them to assist us to provide our services to you. When we do make such disclosures, we will require the agents and service providers to provide the same protection for your personal information as is given by this Privacy Policy.

After you finish being our customer we will use your personal information for our general business purposes, to call you if you switch away to finalise your account and get your feedback, and if you owe us money. After you finish being our customer we may contact you with offers or new plans that may be of interest to you, you can opt out of these communications. We may also use our third-party service providers to call you for the above reasons. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Other than as outlined above, we will not share your information with anyone else. This includes information about the account with anyone living at the property, except if they are named as a customer or authorised person on the account, or the person (or agency) is listed as your nominated alternate contact person.

#### 5. Rights to access and correct

You may ask us for access to any personal information we hold about you. If you think that information is inaccurate or incorrect, you may ask us to consider correcting or deleting it from our database. You can contact us at [hello@flickelectric.co.nz](mailto:hello@flickelectric.co.nz) or give us a call on 0800 435 425.



## 6. Storage and security of personal information

We treat security very seriously. No data transmission over the internet can ever be guaranteed as entirely secure. However, we take appropriate steps to keep your information safe. Access to personal information is only provided to specific staff and only on a 'need to know' basis. Most personal information will be held in our applications. Some personal information will be held physically at our offices. Personal information is encrypted in transit and stored on encrypted servers. Our staff have unique user identifications and passwords. We regularly train our staff on their responsibilities under the Privacy Act and our offices are protected by reasonable security precautions.

## 7. Email and other electronic communication

As part of our offering, we regularly send our customers information. We may do this by email, text message and/or via the Flick App. An example of information sent to you could be notifications about energy you have used, price alerts, etc. We may also send you by email newsletters or other information we think you may be interested in. Newsletters and other information you receive will have instructions for how you can remove yourself from that mailing list. If you ask to be removed from a mailing list, we will do this. Alternatively, you can control the level of electronic communication you receive from us within your account settings on our website, or simply by calling us. You cannot opt out of receiving information that we are obligated to provide to you as your electricity supplier.

## 8. Your user name and password

You are responsible for your user name, email address and password that are used to access your account and the Flick App. Your user name and password can only be used in connection with managing the information relating to the supply of energy to your property or properties. You should not tell anyone else your password or user name, and if you do, you are responsible for any changes they make to your account.

## 9. Card security

When you use your credit or debit card on our website, the credit or debit card information is transmitted using Secure Socket Layer (SSL) protocol, which encrypts your information. We keep only some of your credit or debit card details. Your full credit or debit card details will be encrypted and securely stored by our online payment provider.

## 10. Changing this Privacy Policy

We can change this Privacy Policy at any time. We will tell you about changes by posting an updated policy on our website at [www.flickelectric.co.nz/terms-and-conditions](http://www.flickelectric.co.nz/terms-and-conditions), so we encourage you to periodically review this page for the latest information on privacy practices at Flick.

## 11. Contacting us

If you have any questions about our Privacy Policy or any other privacy matter, please contact our privacy officer at [privacy.officer@flickelectric.co.nz](mailto:privacy.officer@flickelectric.co.nz) or give us a call on 0800 435 425.