

Scopious Privacy Policy

This privacy policy explains how we collect, store, use, and disclose any personal information that you provide to us when using Scopious website and services. We do this in line with the broad principles set out in the New Zealand Privacy Act 2020. Your continued use of our website and services provides your unconditional consent to us collecting, storing, using, and disclosing your personal information in the manner set out below. This privacy policy is subject to and must be read in conjunction with our Terms of Service and Service Level Agreement. This agreement is to be governed by the New Zealand Law and the parties will submit to the exclusive jurisdiction of the Courts of New Zealand.

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Key Points of this Policy

This section contains key points of our privacy policy to help you understand the nature of this policy. This section is not intended to replace the formal contents of this policy, so for full details please continue reading the sections below.

Key points to note:

- We collect minimum personal information from you, just enough to conduct business with you to provide you with our services and third party services.
- We collect usage information about how you use our website and services so we can improve our services to you in the future.
- We do not sell or trade your personal information or end device data to third parties.
- We provide the ability to view, update, and delete your personal data at any time.
- We use industry standard best practices to securely store and protect your personal information.
- We do not intercept, monitor, or store credit card information in our system.
- Your privacy rights are protected by the New Zealand Privacy Act 2020 which gives you at all times the right to obtain and correct any information that is held about you.

What information do we collect?

Scopious collects data to enable us to operate the Services effectively, and to provide you with the best experiences on our website and our Services. You provide some of this data to us directly, such as when you register to use our Services, subscribe to a newsletter, respond to a survey, make an enquiry through our website, contact us for support, or contact us as a prospective customer or reseller. We get some of your data by recording how you interact with our website and our Services by, for example, using technologies like cookies. We also obtain and process data in the context of providing the Services.

Further Details

You have choices about the data we collect. When you are asked to provide personal data, you may decline. But if you choose not to provide data that is necessary to enable us to provide the Services, you may not be able to use all or part of those Services.

The data we collect depends on the context of your interactions with Scopious, the choices you make (including your privacy settings), and the Services you use. The data we collect can include the following:

- **Individual name and contact information.** We collect your first and last name, email address, phone number, password, and other similar contact data.
- **Company name and contact information.** We collect your company name, website, billing address, and other similar contact data.
- **Payment information.** When you first setup your account, a secure window will be opened directly to our payment provider (currently, Stripe), and any payment information that you provide is sent directly to the payment provider. We have no access to that information.
- **Usage information.** We may collect data about your device and how you and your device interact with Scopious and our website and Services. For example, we may collect data about the features you use, the Services you purchase, and the web pages you visit. This includes your interactions on our website, and your interactions with us via email.
- **Network Device information.** We collect data about your network devices (IoT end devices and gateways) and may collect data generated by your end devices depending on the Services you use. For example, we may collect:
 - **End device generated data.** We collect data generated by your IoT end devices when you subscribe to specific Ser-

vices to collect and store end device data. If you do not subscribe to those Services we will not collect and store the generated data.

- **Device, connectivity and configuration data.** We collect data about your devices and the network your devices use to connect to our Services. This includes data to uniquely identify end devices, and security keys to decrypt data generated by the end devices. It may also include information regarding the firmware installed on your devices, connectivity status, and uplink and downlink rates.

What do we use your information for?

We use the data we collect to operate our business, and to provide the Services to you. This includes using the data to improve our Services, and to personalise your experiences. We may also use the data to communicate with you to, to inform you about your account, and give you information about the Services. We may also use the data to manage your email subscriptions, improve the relevance and security of our website, respond to user enquiries, send you periodic marketing communications about our Services, and improve the relevance of our advertising.

Further Details

- **Providing and improving our Services.** We use data to provide and improve the Services we offer, and to perform essential business operations. This includes operating the Services, maintaining and improving the performance of the Services, developing new features, conducting research, and providing customer support.
- **Communications.** We use data we collect to communicate with you, and to personalise our communications with you. For example, we may contact you to discuss your account, to remind you about features of the Services that are available for your use, to update you about a support request, or to invite you to participate in a survey. Additionally, you can sign up for email subscriptions, and choose whether you want to receive marketing communications from us.

How do we protect your information?

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. Data we collect is stored on secure servers in secure data centres, where only authorised personnel have access to it.

Sensitive credit card information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway providers database (currently Stripe) only to be accessible by those authorised with special access rights to such systems, and are required to keep the information confidential. Refer to Stripe Security for further information. Your private financial information (e.g., credit card information) is not viewable by Scopious and not stored on our servers.

If we communicate with you by electronic means or email, we cannot guarantee these communications will not be read or intercepted by third parties, lost or affected by some other reason beyond our control.

Further Details

Any emails we send to you are intended to be only read by the customer. It is the customer's responsibility to ensure any person that has access to the customer's emails is authorised to do so. There may be confidential or personal information provided in those emails which the customer may not wish to share with third parties and it will be the customer's responsibility to ensure that does not happen.

We will not accept liability for any loss arising from anyone not receiving communications through these means or if communications are read by unauthorised people.

Do we use cookies?

Yes. Cookies are small files that a site or its service provider transfers to your computers hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. You can choose to disable cookies, but if you do, your ability to use or access certain parts of our website and services may be affected.

Further Details

We use cookies and other similar identifiers to understand and save your preferences for future visits, to advertise to you on other sites, and to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. However, if you choose to disable cookies, you may be unable to access certain parts of our site. A banner asking you to accept our cookies policy will be displayed upon the first visit to our website (or the first visit after you delete your cookies). Unless you have adjusted your browser setting so that it will refuse cookies and/or you have not accepted our cookies policy, our system will issue cookies when you log on to our site.

Do we disclose any information to outside parties?

We do not sell or trade your personal information to third parties. We will share your personal data with your consent, or as

necessary to provide the Services to you. We will share your data with resellers and partners working on our behalf to provide you the Services; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security of our Services; and to protect our rights or our property.

Further Details

We share personal data with resellers or agents working on our behalf for the purposes described in this Policy. For example, companies we have hired to provide hosting services, off-site backups, and customer support may need access to personal data to provide those functions. In such cases, we ensure these companies have equivalent or stricter data privacy and security requirements, and are not allowed to use personal data they receive from us for any other purpose.

We may disclose your personal data as part of a corporate transaction such as a corporate sale, merger, reorganization, dissolution, or similar event.

Finally, we will access, transfer, disclose, and/or preserve personal data, when we have a good faith belief that doing so is necessary to:

1. comply with applicable law or respond to valid legal process, judicial orders, or subpoenas;
2. respond to requests from public or governmental authorities relating to national security or law enforcement purposes;
3. protect the vital interests of our users, customers, or other third parties (including, for example, to prevent spam or attempts to defraud users of our products, or to help prevent the loss of life or serious injury of anyone);
4. operate and maintain the security of our Services, including to prevent or stop an attack on our computer systems or networks;
5. protect the rights, interests or property of Scopious or associated third parties;
6. prevent or investigate possible wrongdoing in connection with the Services; or
7. enforce our Terms of Service.
8. We may use and share aggregated non-personal information with third parties for marketing, advertising, and analytics purposes.

We do not sell or trade your personal information to third parties.

How to Access and Control Your Data

You can view, access, edit, delete, or request a copy of your personal data for many aspects of the Services. You can also make choices about Scopious's collection and use of your data. How you can access and control your personal data will depend on which Services you use.

You can always choose whether you want to receive marketing communications from us. You can also opt out from receiving marketing communications from us by using the opt-out link on the communication.

Further Details

Data Access and Portability. You can request a copy of your personal data by emailing Scopious at support@scopious.co.nz, entering "Personal Data Request" in the subject line, and providing a short description of what personal data you would like access to in the message body. Scopious will verify your authenticity, then send you a digital export of the data we hold that is associated with your email address. We will use reasonable efforts to respond to your request within 14 days, but in all events within 20 days of our receipt of the request.

Data Erasure. You can request that Scopious delete your personal data by emailing Scopious at support@scopious.co.nz, entering "Delete Personal Data" in the subject line, and providing a short description of what personal data you would like deleted in the message body. Scopious will verify your authenticity, then delete the requested personal data associated with your account. All customer data stored on our servers is eradicated upon a customer's termination of service request and deletion of account after a 24-hour waiting period to prevent accidental cancellation.

End device data can also be deleted by emailing Scopious at support@scopious.co.nz, entering "Delete Device Data" in the subject line, and providing a short description of what device data you would like deleted in the message body. Scopious will verify your authenticity and authority, then delete the requested device data associated with your customer account. We will use reasonable efforts to respond to your request within 14 days, but in all events within 20 days of our receipt of the request.

Please note that we retain billing and usage metadata about a company or individual as required for compliance with law and regulation.

Data Correction. You can modify your personal data by emailing Scopious at support@scopious.co.nz, entering "Update Personal Data" in the subject line, and providing a short description of what personal data you would like updated in the message body. Scopious will verify your authenticity, then update the corresponding information where possible within the Services. We will use reasonable efforts to respond to your request within 14 days, but in all events within 20 days of our receipt of the request.

Your Communications Preferences. You can choose whether you wish to receive marketing communications from us. If you receive marketing communications from us and would like to opt out, you can do so by following the directions in that

communication. Alternatively, you can request that we withdraw consent to use your personal data by emailing Scopious at support@scopious.co.nz and entering "Stop Marketing Communications" in the subject line. Scopious will verify your authenticity, then remove your email address from our mailing lists. We will use reasonable efforts to respond to your request within 14 days, but in all events within 20 days of our receipt of the request.

Please note that these choices do not apply to mandatory communications that are part of the Services, or to surveys or other informational communications that have their own unsubscribe method.

Third Party Links

Occasionally, at our discretion, we may include or offer third party products or services on our website or through our Services. If you access other websites using the links provided, the operators of these websites may collect information from you that will be used by them in accordance with their privacy policies. These third party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Where We Process and Store Your Data

Your personal data collected by Scopious is processed and stored in New Zealand.

LoRaWAN end device data is initially processed by our LoRaWAN service provider in Australia before being forwarded to New Zealand for further processing and possible storage.

Further Details

In order to provide our LoRaWAN Services, we enlist the services of The Things Industries to provide the underlying LoRaWAN network services. These services are hosted in a multi-tenant cloud cluster in Australia where end device identity information is stored securely and where end device data is initially processed. End device data is stored temporarily at this location for redundancy purposes in case of downstream network or service failures. If desired this temporary storage can be disabled upon request by contacting support@scopious.co.nz.

Where end device data is forwarded to for further processing and storage is dependent on what Services you subscribe to.

If you subscribe to the Standard service:

- End device data is forwarded to the platform of your choice for processing and storage. Scopious will not monitor or store your end device data.
- Packet metadata is securely forwarded and stored temporarily in New Zealand for billing purposes and for diagnostic and fault finding purposes.

If you subscribe to the Premium service:

- End device data is securely forwarded and stored in New Zealand.
- Packet metadata is securely forwarded and stored temporarily in New Zealand for billing purposes and for diagnostic and fault finding purposes.

All backup data is stored in New Zealand.

Data Retention

We will retain your personal information as long as you continue to use the Services, have an account with us, or for as long as is necessary to fulfil the purposes outlined in this Policy. You can ask to close your account by contacting us and we will delete your personal information on request.

We will however, retain personal information for an additional period as is required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

Further Details

We will retain your personal data for as long as necessary to provide the Services to you, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different types of data in the context of the different Services we provide, actual retention periods can vary.

If you request to close your customer account:

- Your personal information will not be retained except for information required to be kept under law as mentioned above.
- If you use our Services to store end device data, your device data will be not be retained unless we are required to retain it to fulfil our obligations under other parts of this Policy.

If your customer account becomes inactive:

- We will retain your personal information for a period of 12 months before closing your account.

- If you do not use our Services to store end device data, all your personal information will be deleted when your account is closed except for information required to be kept under law as mentioned above.
- If you use our Services to store end device data and have not agreed to an extended storage duration, your device data will be retained for a period of 12 months before being deleted, unless we are required to retain it longer to fulfil our obligations under other parts of this Policy.
- If you use our Services to store end device data and have agreed to an extended storage duration, your device data will be retained for the extended storage duration before being deleted, unless we are required to retain it longer to fulfil our obligations under other parts of this Policy.

Changes to our Privacy Policy

We will update this privacy statement when necessary to reflect customer feedback and changes in our Services. When we post changes to this statement, we will revise the "last updated" date at the top of the statement. If there are material changes to the statement or in how Scopious will use your personal data, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review this privacy statement to learn how Scopious is protecting your information.

How to Contact Us

If you have any questions or concerns about our Privacy Policy, please contact us by emailing support@scopious.co.nz and enter "Privacy Policy" in the subject line.

If you have a privacy concerns or complaints, please contact us by emailing compliance@scopious.co.nz.

We will try to respond to questions or concerns within 20 days.

You can also contact the office of the Privacy Commissioner on 0800 803 909 for more information or help.