

Please read this privacy policy (the “Policy”) carefully to understand how we use your personal information. If you do not agree with this Policy, your choice is not to use <https://needed.co.nz> and its related sites, applications, services and goods or any other website operated by Needed that links to this Policy (the “Site”). By accessing or using this Site, you agree to this Policy. This Policy may change from time to time; any changes we make to this Policy will be posted on this Site, we may also take any other steps, to the extent required by applicable law, including notifying you and/or seeking your explicit consent to material changes. Changes to this Policy are effective as of the stated “Last Updated” date.

This Policy explains how Needed (collectively “Needed”, or “we”, or “us”, or “our”) collects, uses and shares your personal information in connection with your use of <https://needed.co.nz> (the “Site”, or “Website”) and our services, and explains your choices for how we handle your personal information. For convenience, the Site and our services are collectively referred to as the “Service”.

Needed respects your privacy and is committed to protecting the personal information of its users – buyers, freelancers, collaborators and other visitors browsing the Site (“Users”) as well as affiliates, influencers and other collaborators interacting with Needed. We believe that you have a right to know our practices regarding the information we collect when you visit and/or use the Site. This Policy explains our privacy practices for the Site and services provided by Needed as well as privacy practices that apply to affiliates, influencers and other collaborators who are individuals. By accessing and/or using the Site and its related sites, applications, services, goods and/or registering for a Needed account and/or using it as a collaborator to share comments on a specific project and/or registering to our affiliate or influencer or similar program, you agree to the terms and conditions of this Policy, including to our collection, use, disclosure, processing and retention of your personal information. You can also learn how to limit the sharing of information in this Policy.

## **INFORMATION WE COLLECT**

When you register to the Site or use it as a collaborator, and/or complete forms, and/or register to our affiliate or influencer or similar program, we ask you to provide certain personal information, including a valid email address, Facebook or Google account login details and username. We may ask you to provide or otherwise collect additional information that you provide us, such as, your profile details, physical address, telephone number or other contact details, financial information (such as payment method and credit card number),

details about other social networks linked accounts, details about your listed services, purchases, education, profession and expertise, and additional authentication information (such as your government-issued ID, passport, or driving license, as permitted by New Zealand laws and as detailed in our Freelancer Help Center at [“Verifying Your Identity”](#)). We also collect information about your communications with Needed as well as communication with other users of Needed.

In addition, we collect information while you access, browse, view or otherwise use the Site. In other words, when you access the Site we are aware of your usage of the Site and gather, collect and record the information relating to such usage, including geolocation information, IP address, device and connection information, browser information and web-log information, and all communications recorded by Users through the Site. We use that information to enhance the user experience, personalise your browsing experience as well as monitor the Site for preventing fraud and inappropriate content or behaviour. We also collect supplemental information obtained from third parties such as demographic and navigation data, if applicable.

Additionally, to improve your online experience at Needed, we have implemented impression reporting. While you view our ads, we gather user Global Unique Identifier, HTTP request data like, user agent, IP, host, URL, country/continent from which request made, browser info, device/operating system/operating system version.

Once you register, your username and additional information regarding your activity is made public and is visible to all users of the Site. This information includes photos you upload, your published portfolio, Service information, ratings, and additional information you may choose to add to your profile.

## **HOW DO WE COLLECT INFORMATION?**

You directly provide us with most of the information we collect. You do this by filling out the registration details on the Site, linking to your Needed account accounts of other social networks (please also see the External Links section below), completing application forms, skill tests and customer surveys (if any) as well as by posting and sharing additional information voluntarily. This can include information about freelancers and their Services, User’s location, education and profession, sharing of portfolio, ratings and feedbacks by buyers and anything you choose to add to your user profile.

We also collect technical information indirectly and automatically through our systems. This information includes logging your Internet Protocol (IP) address, software configuration, operating system and use of cookies (cookies are small files sent from us to your computer and sometimes back). Cookies ultimately help us improve your navigation and ease of use of our Site. You can find further information about Cookies in this Policy below, under “Cookies”.

We also collect information from third party vendors and/or partners and/or other commercially available sources such as data aggregators and public databases, who provide us data to supplement the information we collect about you, in accordance with New Zealand laws. For example, we may receive fraud warnings from service providers for our fraud prevention and risk assessment efforts.

If you link, connect, or log in to your Needed Account with a third-party service (e.g. Google, Facebook, LinkedIn), we receive certain information, such as your registration and profile information from that service. This information varies and is controlled by that service or as authorised by you via your privacy settings at that service.

We also receive certain information about you, if you are invited to Needed by another user (for example, as part of our collaboration tools and referral program), in such case, we will receive limited information, such as your email address or other contact information, and we will use it for the same purpose it was provided and by the terms of this Privacy Policy.

## **HOW DO WE USE THE INFORMATION COLLECTED?**

Where relevant under applicable laws, all processing of your personal information will be justified by a “condition” for processing. In the majority of cases, processing will be justified on the basis that:

- you have provided your consent for us to use your personal information for a specific purpose;
- our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you (e.g. to provide you with services which you have purchased);
- the processing is necessary to comply with a relevant legal obligation or regulatory obligation that we have (e.g. fraud prevention); or

- the processing is required to support our legitimate interests as a business (e.g. to improve our services to you), subject to your interests and fundamental rights and provided it is conducted at all times in a way that is proportionate.

We will use your personal information for the following purposes:

- to provide you with quality service and security, to operate the Site and to perform our obligations to you. For example, we use the information collected from you to verify your identity. We also use this information to establish and set up your account, verify or re-issue a password, log your activity, enable your communications with other members, provide customer support and contact you from time to time. The information helps us develop and improve our services to you and customise and personalise your experience (including by making service suggestions, ranking search results, etc.).
- to ensure marketplace integrity, prevent fraud and maintain a safe and secure marketplace. For example, we use your information to track and prevent fraudulent activities and other inappropriate activities and, monitor content integrity, conduct security investigations and risk assessments, verify or authenticate information provided by you, enforce our Terms of Service and comply with applicable laws. We conduct certain behavioural analytics to achieve the above objectives. In limited cases, if we detect activity that we think poses a risk to the Needed marketplace, other users, our community, or third parties, automated processes may restrict or limit your ability to use Needed. If you would like to challenge any such decision, please contact us at [privacy@needed.co.nz](mailto:privacy@needed.co.nz).
- to contact you, as requested by you or otherwise approved by you.
- to promote and advertise the Needed Site and marketplace. For example, we use the information collected from you for the purpose of sending direct marketing messages (as detailed below), to show you information that may be of interest to you, to organise and facilitate referral programs, contests or other promotional activities or events.
- to maintain appropriate business records, to comply with lawful requests by public authorities and to comply with applicable laws and regulations or as otherwise required by law.

We will ask for your consent before using information for a purpose other than those set out in this Policy.

Direct marketing:

- We use your personal information to send you direct marketing communications about our products, services or promotions from Needed that may be of interest to you or our related services. This may be via email, post, SMS, telephone or targeted online advertisements.
- In most cases, our processing of your personal information for marketing purposes is based on our legitimate interest. You have a right to prevent direct marketing of any form at any time – this can be exercised by following the opt-out link attached to each communication or by sending an email to [optout@needed.co.nz](mailto:optout@needed.co.nz).
- We take steps to limit direct marketing to a reasonable and proportionate level and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.

## HOW LONG DO WE KEEP YOUR INFORMATION?

We apply a general rule of keeping personal information only for as long as is required to fulfil the purpose for which it was collected. However, in some circumstances, we may retain your personal information for more extended periods. We may retain your information for the following purposes:

- as long as it is necessary and relevant for our operations, e.g. so that we have an accurate record of your dealings with us in the event of any complaints or challenge; and
- in relation to personal information from closed accounts to comply with applicable laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our Site terms and take other actions as permitted by law.

## CHILDREN UNDER THE AGE OF 18

Our Site is not intended for children under 18 years of age. No one under age 18 should provide any personal information to or on the Site. We do not knowingly collect personal information from children under 18. Parents and guardians should, at all times, supervise their children's activities. If we learn we have collected or received personal information from a child under 18, we will delete that personal information. If you believe we might have any information from or about a child under 18, please contact us at [legal@needed.co.nz](mailto:legal@needed.co.nz).

## SHARING PERSONAL INFORMATION WITH THIRD PARTIES

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent.

We combine your personal information with information we collect automatically or obtain from other companies and use it to improve and personalise our services, content and advertising and/or to prevent fraud. If you do not wish to receive marketing communications from us, you can opt-out through the link attached to each communication or by sending an email to [optout@needed.co.nz](mailto:optout@needed.co.nz).

We provide your personal details to third parties, only in order to operate the Site, provide our services to you, fulfil obligations imposed on us by applicable laws and regulations, and prevent fraud, infringements and illegal activities, as detailed below:

- We share your information with service providers that provide us with services for the purpose of operating the Site, opening and operating your account as well as providing ancillary services (example – payment vendors, CRM systems, forum hosting, community management services, IT SaaS services, mailing systems or technical consultants). Our contracts with these service providers do not permit use of your information for their own (marketing) purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your personal information and only process it in accordance with our instructions;
- We will share your information to law enforcement agencies, public authorities or other parties in order to respond to a subpoena or court order, judicial process or to regulatory authorities, if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes; when we believe it necessary or appropriate to disclose personal information to law enforcement authorities, such as to investigate actual or suspected fraud or violations of law, breaches of security, or breaches of this Policy; to respond to claims against us; and to protect the rights, property, or personal safety of Needed, our customers, or the public;
- We share your information with payment processors, fraud detection agencies and similar third parties for the purpose of securing the Site and protecting it against fraud, unauthorised transactions (such as money laundering), claims or other liabilities;

- We share your information to help facilitate interactions between Users. For example, if you are a Buyer we may share certain limited information about you (such as the fact it is your first purchase on Needed) with the Freelancer to ensure the services you receive from the Freelancer will fit your needs; such sharing of information is limited in scope, will not include personal identifying information (PII) and is only intended to improve the services provided by the Freelancer and your user experience; and
- Your personal information will also be disclosed if we go through a business transition such as a merger, sale, transfer of all or a portion of Needed’s assets, acquisition, bankruptcy or similar event. In the event that we sell any business or assets, we will disclose your data to the prospective buyer. If we or substantially all of our assets are acquired by a third party, information held by us about our users will be one of the transferred assets.

Please note, your profile information and additional information regarding your activity is made public and is visible to all Users of the Site. When you publish your information and/or share your data with other Needed Users, you do so at your own risk. While Needed strives to protect your privacy and our Terms of Service require our Users not to use the data shared with them, Needed cannot ensure that all Users will do so.

This Site is also protected by reCAPTCHA and the [Google Privacy Policy](#), and [Terms of Service](#) apply with respect to data collected by reCAPTCHA. The use of Google reCAPTCHA is required in order to prevent fraud and misuse of the Site by use of automated machines. To learn more, please see Google’s [privacy policy](#).

## COOKIES

When you visit the Site, we use industry-wide technologies such as “cookies” (or similar technologies), which store certain information on your computer and which will allow us, among other things, to enable automatic sign-in to the Site, make your browsing much more convenient and effortless and will enable us to test user experience and offer you personalised browsing or promotions. By continuing to use this Site, you agree to our placing cookies on your computer or device in accordance with the terms of this Policy.

The Site uses cookies to collect statistical data about its use, to tailor the Site’s functionality to suit personal preferences and to assist with various aspects of Site operation. These files contain a variety of information such as information about Needed webpages visited by you, the length of time you visited the Site, data about how

you came to visit the Site, areas viewed by you within the Site, and additional information. Cookies remain on your device for the period described below.

The following is a more detailed explanation of the types of cookies we use:

- Necessary cookies

Necessary cookies are essential and help you navigate the Site. This helps to support security and basic functionality and are necessary for the proper operation of the Site, so if you block these cookies, we can't guarantee your use or the security during your visit.

- Functionality cookies

Functionality cookies are used to provide you with the best user experience. These cookies are, for instance, used to personalise content for you in line with your location. It also allows the Site to remember choices made (like turning off use of cookies or which location you have previously selected) to provide more personal features.

- Performance cookies

Performance cookies help us to understand the behaviour of users of the Site. This allows us to continuously improve the Site to provide the best information in support of our project aims. These cookies are also used to help us understand how effective our Site is; for instance, these cookies tell us which pages visitors go to most often and if they get error messages from web pages. All of the information that these cookies collect is aggregated, to assist us in improving how the Site works.

Third-parties manage some of these cookies, and you may refer to the third parties' own website privacy notifications for further information. In particular, we use Google Analytics cookies to obtain an overall view of user habits and volumes and to help improve the overall experience on the Site. Google Analytics is a third-party web analysis service provided by Google Inc, which uses performance cookies and targeting cookies. The information generated by these cookies about your use of the Site (including your IP address) will be transmitted to and stored by Google Inc on servers in the United States.

Google will use the information collected to evaluate your use of our Site on our behalf, compiling reports on website activity and providing other services relating to activity and internet usage to us. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser as described below. Furthermore, you can prevent Google's collection and

use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. This creates an opt-out cookie which prevents the further processing of your data. For more information about Google Analytics cookies, please see Google's [help pages](#) and [privacy policy](#).

If you prevent these cookies, we cannot guarantee how the Site will perform for you.

## BLOCKING OR DELETING COOKIES

We shall store a cookie on your computer or device to remember this for next time so that we can store your preferences and save you time on subsequent visits by eliminating the need to enter the same data repeatedly. You may set your browser to block all cookies, including cookies associated with our services, or to indicate when we are setting a cookie. You should do this through the browser settings for each browser you use. Please be aware that some of our services will not function if your browser does not accept cookies. However, you can allow cookies from specific websites by making them “trusted websites” in your internet browser.

The following links may assist you in managing your cookies settings, or you can use the ‘help’ option in your internet browser for more details:

- [Internet Explorer](#)
- [Google Chrome](#)
- [Safari](#)
- [Adobe \(flash cookies\)](#)

If you share the use of a computer or device, accepting or rejecting the use of cookies may affect all users of that computer or device.

Information on deleting or controlling cookies is also available at [www.aboutcookies.org](http://www.aboutcookies.org) (note that this website is not provided by Needed, and we, therefore, cannot ensure its accuracy, completeness or availability). It is important to remember that many of our services may not function properly if your cookies are disabled. For example, cookies may, in some instances, save you from the need to enter usernames and passwords and allow session continuity.

## **EXTERNAL LINKS**

Please note that the Site contains links to third party sites and if you link to a third-party site from the Site, any data you provide to that Site and any use of that data by the third party are not under the control of Needed and are not subject to this Policy. You should consult the privacy policies of each Site you visit. This Policy applies solely to personal information collected by our Site. If you upload content, including your personal information, to a social network and then tag the Site, your submission will be subject to that social network's terms of use and privacy policy, even where you post on an official Needed page on the social network. We do not have control over these terms of use and privacy policies and have not reviewed their adequacy. You should, therefore, review these before submitting any personal information.

## **SECURITY**

We take great care in maintaining the security of the Site and your information and in preventing unauthorised access, loss, misuse, alteration, destruction or damage to it through industry standard technologies and internal procedures. Among other things, we regularly maintain a PCI DSS (Payment Card Industry Data Security Standards) certification (concerning payment by credit cards). Also, we contractually ensure that any third party processing your personal information equally provide for confidentiality and integrity of your data securely. However, the transmission of data via the internet is not completely secure, and although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorised access.

Users who have registered to the Site agree to keep their password in strict confidence and not disclose such password to any third party.

Further information about our data security practices can be provided on request.

## **UPDATING YOUR INFORMATION**

We take steps to ensure that the personal information we collect is accurate and up to date, and we provide you with the opportunity to update your information through your account profile settings. In the event that you believe your information is in any way incorrect or inaccurate, please let us know immediately. We will make

sure we investigate the matter and correct any inaccuracies as quickly as possible where necessary or give you ways to update it promptly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we will ask you to verify your identity before we can act on your request. If for any reason you have a problem with deleting your personal information, please contact Needed’s Customer Support and we will make reasonable efforts to delete any such information pursuant to any applicable privacy laws.

You can review and change your personal information by logging into the Site and visiting your account profile page.

If you delete your User Generated Content (“UGC”), as defined in the Needed Terms of Service, from the Site, copies of your UGC may remain viewable in cached and archived pages, or might have been copied or stored by other Site users. Proper access and use of information provided on the Site, including UGC, is governed by our Terms of Service.

## **CONTACT US**

If you have any questions about this Privacy Policy, please contact us at [legal@needed.co.nz](mailto:legal@needed.co.nz). We will process any requests in line with New Zealand laws and our policies and procedures