



Tempo

Privacy Policy

Version 1.1 | 14 August 2023

In this Privacy Policy, the terms 'Tempo', 'we', 'us', and 'our' refer to Tempo Limited. 'Forsyth Barr' refers to Forsyth Barr Limited and any of its related companies.

We respect the privacy of our customers. This Privacy Policy explains how we may collect, store, use, and disclose information (including personal information) that you provide to us or which we obtain about you. In doing so, we are following our obligations under the Privacy Act 2020.

By continuing to use our services you consent to the collecting, storing, using, and disclosing of your information in the manner set out in this Privacy Policy.

We may update this Privacy Policy at any time. Any changes will take effect as soon as they are published on our website. Please check this Privacy Policy regularly for modifications and updates. If you continue to use the Tempo app, or if you provide any information after we post changes to this Privacy Policy, this means you have accepted those changes.



Information we collect about you

Your personal details

We will collect information from you when you sign up to and use the Tempo app. This includes: your name, date of birth, driver licence or passport number, email address, phone number, postal address, bank account details, and tax details.

You may decide not to provide your information to us. However, if you do not provide it, we may not be able provide you with access to our services.

Your use of Tempo

We will also collect information about you and your savings goals in the Tempo app, and in relation to your transactions and investments. This enables us to provide our services to you.

We may also collect information about your use of

the Tempo app and/or website, including information relating to when and how long you use the Tempo app or website, and how you interact with it. This allows us to improve our services to you.

Information from third parties

We may collect information about you from third parties, but only for the purposes described in this Privacy Policy, as otherwise agreed with you, or if required or permitted by law.



How we use your personal information

We will not use your personal information except for the purposes described in this Privacy Policy or otherwise as agreed with you.

We will use your information so that you can use our services

We will use your information to provide you with our services and to communicate with you, including to provide tailored Tempo app notifications. We may also use the information you give us to fix operational issues, make improvements or updates, provide you with customer support, or as otherwise permitted by law.

We may use your information to comply with the law

We may need to use your information to verify your identity, comply with transaction reporting obligations, or comply with any other relevant law.

We may use your information to tell you about other products or services

We may use your information to contact you about other products and services provided by us or Forsyth Barr.

We may use your information to analyse use of our services

We may use your information to analyse use of the Tempo app or our website. Your information may also be combined with other customers' information – this allows us to see patterns to help us improve our services.



When we may disclose your information to third parties

We will not give your information to third parties except for the purposes described in this Privacy Policy, as otherwise agreed with you, or where required or permitted by law.

Who we can disclose your information to

We may share your personal information internally and with third parties in order to provide our services to you and comply with our legal obligations. These third parties include: Forsyth Barr, identity verification services such as Cloudcheck and Akahu, cloud-storage providers, our lawyers, consultants, accountants, insurers, other professional advisors, the administrator of the Tempo Funds, and the supervisor of the Tempo Funds.

We may disclose your information to verify your identity

You authorise us, Forsyth Barr and our agents to collect information about you from, or disclose information about you to, credit reporting agencies, the New Zealand Transport Agency, the New Zealand Government Confirmation Service and the Department of Internal Affairs for the purpose of verifying your identity in accordance with all applicable laws and regulations in New Zealand.

We may disclose your information to overseas third party service providers

By using the Tempo app or our website, you acknowledge that your personal information may be disclosed to overseas third party service providers who may not be required to protect the information in a way that, overall, provides comparable safeguards to those that apply in New Zealand. However, we will use reasonable efforts to make sure that these third parties have adequate privacy safeguards in place.

We may disclose your information where required or permitted by law

We may also disclose (or otherwise use) your information if we are required or permitted by law to do so, or if we believe disclosure is necessary for law enforcement purposes or to enforce any legal rights we, or our customers, or others may have.

We may also need to disclose (or otherwise use) your information to protect against fraud or crime.



How cookies and other automated tools are used

When you use the Tempo app or our website, we may use automated tools and methods, such as cookies, to collect certain information about your visit including your IP address, domain name, type of device you use, and the date, time, and duration of your visit.

We use third parties such as Mixpanel Analytics and Google to collect and use this information to help us provide you with a more personalised service by analysing your preferences and trends. These third parties may use cookies and other similar technology which we have no control over. This helps us make informed decisions when applying new features to, or improving the usability of, the Tempo app.



How long we retain your information for

We may keep your personal information for as long as you have an account with us or as long as it is necessary for the purposes for which we collect it.

To comply with regulatory, tax, insurance and other purposes we will need to keep some of your information for up to 7 years after your account has closed.



How we store and secure your information

Information collected through the Tempo app or our website is collected and stored by us, Forsyth Barr, or our agents. We will take reasonable steps (including implementing physical and electronic security measures) to protect information that we hold from loss, unauthorised access, use, modification or disclosure, and other misuse.



Third party links

Our app or website may contain links to websites operated by third parties. We are not responsible for the content of such websites, or the way in which those websites collect, store, use, and disclose any personal information you provide.

When you visit third party websites from hyperlinks displayed on our app or website, we encourage you to review the privacy statements of those websites so that you can understand how the personal information you provide may be collected, stored, used and disclosed.



Your right to access and correct your information

If you have any questions about this Privacy Policy or want to request access to, or correct, any personal information we hold about you, please email help@tempo.co.nz.

To ensure that the personal information we hold about you is accurate and current, please notify us of any changes to your personal information as soon as possible.



Further information about privacy

The Office of the Privacy Commissioner (<http://www.privacy.org.nz>) has further information about New Zealand's privacy laws.