

PRIVACY POLICY
SOUTHERN PURSUIT LIMITED

Contents

Contents	1
1. INTRODUCTION	2
2. COLLECTION OF INFORMATION	2
3. USE OF INFORMATION	3
4. DISCLOSURE OF INFORMATION	4
5. STORAGE AND SECURITY	5
6. WEBSITE TECHNOLOGY	5
7. MARKETING COMMUNICATIONS	7
8. YOUR PRIVACY RIGHTS	7
9. CONTACT DETAILS	8
10. CHANGES TO THIS PRIVACY POLICY	8

1. INTRODUCTION

1.1 Southern Pursuit Limited ("**we**", "**us**", "**our**") is committed to protecting the privacy of individuals who use our website at <https://www.southernpursuit.co.nz> (the "**Website**"), our online booking platform (the "**Booking Platform**"), and our hunting, camping, transport, and outdoor support services (the "**Services**").

1.2 This Privacy Policy explains how we collect, hold, use, and disclose personal information in accordance with the Privacy Act 2020 (the "**Act**") and applicable guidance issued by the Office of the Privacy Commissioner ("**OPC**"). It applies to all personal information we collect, whether through the Website, the Booking Platform, by email or telephone, in person, or from third parties.

1.3 By using the Website, the Booking Platform, or the Services, you acknowledge that you have had a reasonable opportunity to read this Privacy Policy. Where we collect personal information about other members of your party (for example, other passengers or hunting party members), you must ensure that you are authorised to provide us with their personal information and that they have been made aware of this Privacy Policy, or you must direct them to it before, or as soon as practicable after, providing their information to us.

1.4 This Privacy Policy does not apply to the practices of third-party websites, payment providers, or service providers that we link to or engage, which maintain their own privacy policies. We encourage you to review those policies separately.

2. COLLECTION OF INFORMATION

2.1 We collect personal information directly from you wherever reasonably practicable, including when you:

- make an enquiry through the Website, by email, or by telephone;
- submit a Booking Request through the Booking Platform;
- make a payment for Services;
- create a customer account or profile;
- subscribe to marketing communications or a newsletter;
- correspond with us regarding your Booking or a complaint; or
- provide feedback, reviews, or respond to a survey.

2.2 Depending on the nature of your enquiry, Booking, or use of the Services, the personal information we collect may include:

- **Contact and identity information:** name, postal and email address, telephone number, and date of birth (where relevant to age-restricted Services).
- **Booking information:** Services requested, dates, party size and names of party members, special requirements, and communications relating to your Booking.
- **Payment information:** payment card details, bank account details, and billing address, which are processed by our third-party payment providers as described in clause 3; we do not store full payment card numbers on our own systems except as strictly necessary and permitted by card scheme rules.
- **Customer account information:** login credentials, booking history, and preferences, where you create an account through the Booking Platform.

- **Marketing subscription information:** your email address and communication preferences, where you opt in to receive marketing communications.
- **Location and GPS information:** Southern Pursuit Limited's vehicles are not currently fitted with GPS tracking devices. If GPS tracking is introduced in future for vehicle recovery, safety, security, or fleet management purposes, this Privacy Policy will be updated to explain the information collected, the purposes for which it is used, and applicable retention periods.
- **Driver licence information:** for Vehicle hire, we collect driver licence details (including licence number, class, expiry, and a copy or photograph of the licence) to verify eligibility to drive under clause 21 of our Terms and Conditions, and as required for insurance and Land Transport Act 1998 compliance purposes.
- **Identity verification information:** where required for security, fraud prevention, age verification, or regulatory compliance (for example, verifying identity for higher-value Bookings, bond arrangements, or firearms-related permit checks conducted independently by you), we may collect identity documents such as a passport or other government-issued identification.

2.3 We may also collect personal information indirectly, including from: a person making a Booking on your behalf (such as a travel agent, employer, or group organiser); publicly available sources; social media platforms, where you interact with our public content; and analytics, advertising, and cookie technologies described in clause 6.

2.4 If you provide us with information that is not reasonably necessary for the purpose for which it is collected, we may decline to collect or retain it. If you do not provide certain information (for example, driver licence details for a Vehicle Booking, or payment information), we may be unable to accept your Booking Request or provide the relevant Service.

3. USE OF INFORMATION

3.1 We collect, hold, and use personal information for the following purposes:

- **Processing Bookings:** to review, accept, confirm, and administer Booking Requests, including verifying eligibility (such as driver licensing) and arranging Equipment, Vehicles, drivers, and itineraries.
- **Customer support:** to respond to enquiries, provide support during a Booking, and manage complaints.
- **Invoicing and payment:** to generate invoices, process payments, deposits, and bonds, and manage refunds and debt recovery.
- **Service delivery:** to deliver the Services, including transport, delivery and collection, provisioning, and coordination with drivers and contractors.
- **Safety and compliance:** to conduct safety briefings, verify licensing and identity where required, manage incidents and accidents, comply with our obligations under the Land Transport Act 1998, the Health and Safety at Work Act 2015, insurance requirements, and other applicable law, and to protect the safety of our customers, staff, and contractors.
- **Marketing communications:** to send you information about our Services, offers, and updates, where you have opted in to receive these, and in accordance with the Unsolicited Electronic Messages Act 2007. You may opt out at any time as described in clause 7.
- **Legal obligations:** to comply with our obligations under applicable law, respond to lawful requests from regulators or law enforcement, establish, exercise, or defend legal claims, and maintain records as required by the Tax Administration Act 1994 and other legislation.

- **Business operations:** for internal purposes such as record-keeping, fraud prevention, quality assurance, staff training, and improving our Services and Website.

3.2 We will only use personal information for the purpose for which it was collected, or for a directly related purpose, unless the Act permits another use (for example, where required by law, necessary to prevent a serious threat to health or safety, or where you have separately consented).

4. DISCLOSURE OF INFORMATION

4.1 We may disclose personal information to the following categories of recipients, only to the extent reasonably necessary for the purposes described in clause 3:

- **Payment providers:** third-party payment processors and merchant service providers, to process payments, deposits, bonds, and refunds.
- **Contractors and drivers:** contract drivers, guides, and other contractors engaged to deliver Services, to enable them to provide those Services safely (for example, providing a driver with a passenger manifest, or providing Vehicle collection details to a contractor performing a delivery).
- **Service providers:** providers engaged by us to operate the Booking Platform, host the Website, provide customer relationship management, accounting, IT, and email/SMS communication services, and other operational service providers, under contractual arrangements requiring them to protect personal information consistently with this Policy.
- **Insurance providers:** our insurers and insurance brokers, and, where relevant, the Customer's nominated insurer, in connection with claims, accident reporting, or verification of cover.
- **Regulators and law enforcement:** government agencies, the New Zealand Police, NZTA, and other regulators, where disclosure is required or authorised by law, or reasonably necessary to report an accident, offence, or safety incident, or to respond to a lawful request.
- **Professional advisers:** our lawyers, accountants, and other professional advisers, where reasonably necessary in connection with their engagement.
- **Business transfer:** a prospective purchaser or successor of our business or assets, in connection with an actual or proposed sale, merger, or reorganisation, subject to appropriate confidentiality protections.
- **Website hosting, maintenance and form processing services** may be provided by Nettl. Personal information submitted through the Website may therefore be accessible to Nettl for support, maintenance and troubleshooting purposes.

4.2 We do not sell personal information to third parties.

4.3 Where we disclose personal information to a service provider who holds or processes it only on our behalf (an "agent" under the Act), we remain responsible for that information, and require the service provider to use and protect it consistently with this Policy and the Act.

4.4 We may disclose personal information overseas where a service provider (such as a cloud hosting, payment processing, or booking platform provider) stores or processes data outside New Zealand. Where we do so, we will take reasonable steps to ensure the overseas recipient is subject to privacy standards comparable to those under the Act (for example, because the recipient is subject to a comparable law, is a member of a recognised privacy framework, or is contractually bound to protect the information to a comparable standard), as required by information privacy principle 12 of the Act.

5. STORAGE AND SECURITY

5.1 We store personal information electronically, using computer systems and, where applicable, cloud-based service providers, and in limited cases in physical form (for example, printed booking sheets used operationally and then securely destroyed or filed).

5.2 We take reasonable steps, in accordance with information privacy principle 5 of the Act, to protect personal information from loss, unauthorised access, use, modification, or disclosure, and from other misuse, including: access controls and password protection; staff training on privacy and confidentiality obligations; secure storage of physical documents containing personal information (including driver licence copies and identity documents); use of reputable, security-conscious third-party service providers; and encryption of payment information in accordance with card industry security standards, where applicable.

5.3 No method of electronic storage or transmission is completely secure. While we take reasonable steps to protect personal information, we cannot guarantee its absolute security.

5.4 We retain personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, to manage our business operations, and to comply with our legal obligations.

Without limitation:

- Booking enquiries and booking records are retained for up to **2 years** after completion of the relevant booking.
- Accounting, invoicing, taxation, and related financial records are retained for at least **7 years** as required by applicable law, including the Tax Administration Act 1994.
- Driver licence verification records are retained only for so long as is reasonably necessary to manage insurance, legal, safety, and operational obligations arising from the booking. Driver licence images submitted through the Website are not retained on the Website server following submission.
- Website enquiry form records are retained for up to **60 days**, after which they are automatically deleted, unless a longer retention period is required for an active booking, legal obligation, dispute, insurance purpose, or other legitimate business purpose.

Once personal information is no longer required for these purposes, Southern Pursuit Limited will take reasonable steps to securely destroy, delete, or permanently de-identify the information in accordance with Information Privacy Principle 9 of the Privacy Act 2020.

5.5 If we experience a privacy breach that has caused, or is likely to cause, serious harm to an affected individual, we will notify the Privacy Commissioner and affected individuals as soon as practicable, in accordance with Part 6 of the Act.

6. WEBSITE TECHNOLOGY

6.1 Cookies: The Website uses cookies and similar technologies (such as local storage and pixel tags) to operate correctly, remember your preferences, enable the Booking Platform to function, and understand how visitors use the Website. Cookies are small text files stored on your device. You can manage or disable

cookies through your browser settings, but doing so may affect the functionality of the Website and Booking Platform, including your ability to complete a Booking.

6.2 Analytics: We may use third-party analytics services (such as Google Analytics) to collect information about how visitors use the Website, including pages visited, time spent, and general location (derived from IP address), to help us understand and improve the Website. This information is generally aggregated and used in a form that does not directly identify you, but may be combined with other information in limited circumstances.

6.3 Tracking technologies and advertising: The Website uses Google Analytics to help us understand how visitors interact with the Website and to improve our online services.

Southern Pursuit Limited does not currently use Meta Pixel, Google Ads remarketing technologies or other behavioural advertising tracking technologies. If such technologies are introduced in the future, this Privacy Policy will be updated and any required consent mechanisms implemented.

6.4 Website Enquiry and Booking Request Forms: The Website contains enquiry and booking request forms created using Gravity Forms, a form management plugin operating within the Website. Current forms include:

- Transfer Booking Form
- Van Hire Booking Form

Submission of a form does not create a booking, reserve services, or process payment. Information submitted through these forms is received and reviewed by Southern Pursuit Limited. Availability will be confirmed separately and, where a booking request is accepted, an invoice and Booking Confirmation will be issued in accordance with our Terms and Conditions.

Information collected through these forms may include:

- First and last name
- Email address
- Telephone number
- Transfer or vehicle hire requirements
- Driver licence information and supporting documentation (for vehicle hire enquiries)

Information submitted through these forms is stored within the Website database. Personal contact information is stored using encryption and other reasonable security measures. Driver licence images or copies uploaded through the Website are not retained on the Website server following submission and are removed following processing.

The Website and associated form data may be hosted, backed up, or supported by third-party technology and hosting providers acting on behalf of Southern Pursuit Limited. Those providers may have incidental access to information stored within the Website as necessary to provide hosting, maintenance, security, backup, and technical support services.

Form submission records are retained for up to 60 days and are then automatically deleted, unless a longer retention period is required for an active booking, legal obligation, dispute, compliance requirement, insurance purpose, or other legitimate business purpose.

Information collected through these forms is used solely for the purposes of responding to enquiries, assessing booking requests, communicating with customers, administering bookings, complying with legal obligations, and operating Southern Pursuit Limited's business. Southern Pursuit Limited does not sell personal information and will only disclose such information to third parties as described in this Privacy Policy or where required or permitted by law.

7. MARKETING COMMUNICATIONS

7.1 We will only send you marketing communications (such as email newsletters or promotional offers) where you have opted in, where you are an existing customer and the communication relates to similar services (in accordance with the Unsolicited Electronic Messages Act 2007), or otherwise as permitted by law.

7.2 Every marketing communication we send includes a functional unsubscribe mechanism. You may also opt out at any time by contacting us using the details in clause 9. Opting out of marketing communications does not affect our ability to send you operational communications relating to an active or confirmed Booking.

8. YOUR PRIVACY RIGHTS

8.1 Access requests: You have the right to request confirmation of whether we hold personal information about you, and to request access to that information, under information privacy principle 6 of the Act.

8.2 Correction requests: You have the right to request that we correct personal information about you that you consider to be inaccurate, incomplete, misleading, or out of date, under information privacy principle 7 of the Act. If we do not agree to make the correction, you may require us to attach a statement of the correction sought to the information.

8.3 How to make a request: Requests for access or correction should be made in writing to the contact details in clause 9. We will respond as soon as reasonably practicable and, in any event, within the timeframes required by the Act (currently no later than 20 working days after your request is received). We may need to verify your identity before actioning a request, and in limited circumstances permitted under the Act, we may withhold certain information or charge a reasonable fee for making information available.

8.4 Complaints: If you have a concern about how we have handled your personal information, please contact us in the first instance using the details in clause 9, so that we can investigate and respond. If you are not satisfied with our response, you may make a complaint to the Office of the Privacy Commissioner:

- Website: www.privacy.org.nz
- Online complaint form available via the OPC website
- Phone: 0800 803 909

9. CONTACT DETAILS

9.1 If you have any questions about this Privacy Policy, or wish to make an access, correction, or other request, please contact:

Southern Pursuit Limited

Attention: Privacy Officer (Dana Shaw)

Email: office@southernpursuit.co.nz

10. CHANGES TO THIS PRIVACY POLICY

10.1 We may update this Privacy Policy from time to time to reflect changes in our practices, our Services, or the law. The current version will always be available on the Website. Where changes are material, we will take reasonable steps to bring them to your attention (for example, by notice on the Website or by email to registered account holders).

This Privacy Policy was last updated on August 2026 Version 1.