

Chnnl Limited (Chnnl) Privacy Policy

Plain English Terms

The General Terms below are legal terms that serve to protect us and make clear the privacy terms that will apply to users of Chnnl services. These terms below are here to give you a simple explanation of what the General Terms mean in plain English.

However, these plain English terms are not legally binding and the General Terms are still the legal terms that will apply in a legal dispute.

- **Information:** Chnnl stores your information when you use our service. Because of this, Chnnl takes on the legal responsibilities that come with storing this information.
- **Collection and Use of Information:** In order to successfully deliver Chnnl service, we are required to collect and disclose your information in an anonymised report to your employer.
- **Your Rights:** You have the right to be able to access, amend and delete the information you supply to us.
- **Cookies:** Our service uses cookies to collect data and improve itself. You can either accept or refuse these cookies and know when it is being sent to you. If you refuse, you might not be able to use some parts of our service.
- **Security:** Chnnl uses highly secure cloud services by Amazon Web Services. AWS provides encryption in transit with TLS across all services.
- **Third-party Links:** When you click on a third-party link to another site that is not operated by us, we have no control over or responsibility for the content or privacy policies of these other sites.

General Terms

Chnnl Limited (a limited company incorporated in New Zealand) (**Chnnl**) has developed the Chnnl mobile application (**App**) to collect information from an organisation's work force to measure their personal wellbeing (**Service**). This Privacy Policy applies to users of the App and the web address www.chnnl.app (**Website**).

This Privacy Policy is used to inform you of Chnnl's policies relating to the use, collection and disclosure of Information when you use our Service. It also provides for the rights customers have in respect of their Information. When we talk about information, we mean information that you supply in order for us to produce anonymised reports to your employer.

By using the Service, you agree to be bound by the terms of the then current privacy policy (**Privacy Policy**). Chnnl reserves the right, at any time, to modify or replace the Privacy Policy. The most recent version of the Privacy Policy is available at www.chnnl.app/privacypolicy. Please check the Privacy Policy page periodically for changes, though we will also notify you via the Service of any changes that, in our sole discretion, materially impact your use of the Service or the treatment of your Information. Your use of the Service following the posting of any changes to the Privacy Policy constitutes acceptance of those changes.

By accessing the Website/App and/or reports you consent to Chnnl collecting, using and disclosing Information about you that is provided by you or another person as described below.

The terms used in this Privacy Policy have the same meanings as in our Services Agreement, (which is accessible via the Service) unless otherwise defined in this Privacy Policy.

Collection of Information

The nature of the Service requires that individuals using the Website/App disclose to Chnnl anonymised information relating to them.

We only collect Information that is:

- Necessary for the purposes of the Services,
- For the performance of a contract for which you are a party,
- Necessary for which you have given consent for such processing of your data, or
- Required for compliance with a legal obligation to which we are subject.

The type of Information we collect or which we may hold about you may include, but is not limited to:

- Age range;
- Gender;
- Ethnicity;
- Phone number;
- Email address;
- Device information including identifiers;
- In-app usage information including answers to questionnaires, journal entries, responses clicked and features used; or
- Location information (where you are using location-based features and location settings have been activated on your device).

You have no obligation to provide Chnnl with any Information that is requested by us. However, due to the nature of the Service, if you choose not to provide us with such information, we will be unable to provide you with the full benefit of our Service.

We collect your Information in the following ways:

- When you provide us with this information in order for us to produce anonymised reports to your employer;
- When you provide information about a customer service issue; and
- When you visit our Website/App.

In the event where you provide us with personal information that identifies an individual, we will immediately remove that information from the data we provide to the employer.

Using your Information

We understand the importance of using your information in a responsible and secure manner. Your Information may only be used by Chnnl under the following circumstances:

- to identify you when you register and login to your account;
- the operation and maintenance of your account;
- to enable us to operate the Service and provide it to you as requested;
- payment processing;
- dealing with requests, enquiries, complaints, and other customer services;
- to analyse the Website and information about users, including research into our user demographics and user behaviour in order to improve our content and Service;
- to contact you about your account and provide customer service support, including responding to your comments and questions;
- to share aggregate (non-identifiable) statistics of users of the Service to prospective advertisers and partners;
- to keep you informed about the Service, features and offers we think you may find useful or which you have requested from us;
- to sell or market Chnnl products and services to you;
- to comply with any legal, government or regulatory obligation;
- interacting with organisations that Chnnl has a business relationship with for the purpose of enabling the performance of the Service or other services you expressly require;
- to better understand your needs and the needs of users in the aggregate, diagnose problems, analyse trends, improve the features and usability of the Service, and better understand and market to our customers and Users; and
- to keep the Service safe and secure.

In using our Service you authorise Chnnl to pass on any information that you provide us to your employer when you use the Service.

We may use your information for other purposes which are directly related to those above that would reasonably be expected by you.

You will receive marketing messages from us if you have given your consent, if you have requested or if you use the Service to access products or experiences from us and if you have not opted out of receiving marketing messages.

Storage of Information

Chnnl is a New Zealand company with its head-office located in Auckland, New Zealand.

Your data will be held by AWS in Sydney. AWS provides encryption in transit with TLS across all services. AWS services are fully compliant for the purposes of the GDPR. For more information about this please visit: <https://aws.amazon.com/blogs/security/all-aws-services-gdpr-ready/>

We may store your data temporarily or permanently in New Zealand. For the purposes of the General Data Protection Regulation (**GDPR**) New Zealand is considered a country which provides adequate protections for Information, as confirmed by the European Commission in Commission Decision 2013/65/EU.

We will only retain your information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or statutory reporting requirements.

Chnnl has appointed a Privacy Officer who can be contacted at privacy@chnnl.app.

Your Rights

You can check and update the information you have provided to us by accessing your "Settings" section of your account on the Website/App.

If you decide to terminate your account, we will deactivate it, and remove information. Remember that once your account is closed, you will no longer be able to login and access your information. You can however, request to open a new account at any time.

You have the option of changing your marketing preferences at any time your account remains open via account settings.

You have the following rights with regard to your information:

- The right to request access to your information. This enables you to receive a copy of the Information we hold about you.
- The right to request to correct your information if it is inaccurate. You may also supplement any incomplete information we have, taking into account the purposes of the processing.
- The right to request deletion of your information if;
 - your information is no longer necessary for the purposes for which we collected or processed; or
 - you withdraw your consent if the processing of your information is based on consent and no other legal ground exists; or
 - you object to the processing of your information and we do not have an overriding legitimate ground for processing; or
 - your information is unlawfully processed; or
 - your information has to be deleted for compliance with a legal obligation.
- The right to object to the processing of your information. We will comply with your request, unless we have a compelling overriding legitimate interest for processing or we need to continue processing your information to establish, exercise or defend a legal claim.
- The right to restrict the processing of information, if:
 - The accuracy of your information is contested by you, for the period in which we have to verify the accuracy of the information; or
 - The processing is unlawful and you oppose the deletion of your information and request restriction; or
 - We no longer need your information for the purposes of processing, but information is required by you for legal claims; or
 - You have objected to the processing, for the period in which we have to verify overriding legitimate grounds.

You can exercise several of your rights through the information section of your account. To exercise your other rights you can file a request by email to privacy@chnnl.app.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your information (or to exercise any of your other rights). This is a security measure to ensure that information is not disclosed to any person who has no right to receive it. In an effort to speed up our response, we may also contact you to ask you for further information in relation to your request.

Log Data

Whenever you visit our Service, Chnnl collects information that your browser sends to us that is called Log Data. This Log Data may include information such as your device's Internet Protocol (IP) address, browser version, pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other statistics.

Cookies

Cookies are files with small amounts of data that is commonly used as an anonymous unique identifier. These are sent to your browser from the Website and are stored on your device's hard drive.

Our Website/App uses these "cookies" to collect information and to improve our Service for users (for example to temporarily remember your session in order to not ask you to fill this information again each time you visit the Website or go to one page to another). Some other cookies are used to generate statistics or to remember your preferences.

You have the option to either accept or refuse these cookies, and know when a cookie is being sent to your computer. If you choose to refuse our cookies, you may not be able to use some parts of our Service.

Service Providers

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Service;
- To provide the Service on our behalf;
- To perform Service-related services; or
- To assist us in analyzing how our Service is used.

Security

The security of your information is imperative. We endeavour to employ best practice standards to ensure unauthorised access and disclosure of your information does not occur.

Chnnl uses a highly secure AWS cloud service to protect your data. AWS provides encryption in transit with TLS across all services.

Links to Other Sites

Our Service may contain links to other websites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over, and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact our Privacy Officer at privacy@chnnl.app.