

# Spotlight Reporting Privacy Policy

At Spotlight Reporting Limited, we take privacy very seriously. We've updated our privacy policy (**Policy**) to ensure that we communicate to You, in the clearest way possible, how we treat personal information. Please read this Policy carefully.

This Policy's defined terms have the same meaning as in our [Terms of Use](#), which You should read together with this Policy. By accessing our Website and using Your Subscription, You consent to the terms of this Policy and agree to be bound by it and our Terms of Use.

## Collection of Your personal information

Spotlight Reporting Limited is a provider of reporting software that's secure, and gives business owners and advisors real-time visibility of a business' financial position.

Your Subscription involves the storage of Data about a company or individual. That Data can include personal information. "Personal information" is information about an identifiable individual, and may include information such as the individual's name, email address, and accounting and financial information.

Spotlight Reporting Limited may collect personal information directly from You when You:

- register to use Your Subscription,
- use Your Subscription,
- post to the Spotlight Reporting Limited Community forum or on our blog,
- contact the Spotlight Reporting Limited Support team, and/or
- visit our Website.

You can always choose not to provide Your personal information to Spotlight Reporting Limited, but it may mean that we are unable to provide You with Your Subscription to our software.

## Spotlight Reporting Limited may receive personal information from You about others

Through Your use of Your Subscription, Spotlight Reporting Limited may also collect information from You about someone else. If You provide Spotlight Reporting Limited with personal information about someone else, You must ensure that You are authorised to disclose that information to Spotlight Reporting Limited and that, without Spotlight Reporting Limited taking any further steps required by applicable data protection or privacy laws, Spotlight Reporting Limited may collect, use and disclose such information for the purposes described in this Policy.

This means that You must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, Spotlight Reporting Limited's identity, and how to contact Spotlight Reporting Limited.

Where requested to do so by Spotlight Reporting Limited, You must also assist Spotlight Reporting Limited with any requests by the individual to access or update the personal information You have collected from them and entered into the Subscription.

## Spotlight Reporting Limited collects, holds, and uses Your personal information for limited purposes

Spotlight Reporting Limited collects Your personal information so that we can provide You with Your Subscription and any related Subscriptions You may request. In doing so, Spotlight Reporting Limited may use the personal information we have collected from You for purposes related to the Subscriptions including to:

- verify Your identity,
- administering Your Subscription,
- notify You of new or changed Subscriptions offered in relation to the Subscription,
- carry out marketing or training relating to the Subscription,
- assist with the resolution of technical support issues or other issues relating to the Subscription,
- comply with laws and regulations in applicable jurisdictions, and
- communicate with You.

By using the Subscription, You consent to Your personal information being collected, held and used in this way and for any other use You authorise. Spotlight Reporting Limited will only use Your personal information for the purposes described in this Policy or with Your express permission.

It is Your responsibility to keep Your password to the Subscription safe. You should notify us as soon as possible if You become aware of any misuse of Your password, and immediately change Your password within the Subscription or via the [Forgotten Password](#) process.

## Aggregation of Your non-personally identifiable data

By using Your Subscription, You agree that Spotlight Reporting Limited can access, aggregate and use non-personally identifiable data Spotlight Reporting Limited has collected from You. This data will in no way identify You or any other individual.

Spotlight Reporting Limited may use this aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using Your Subscription,
- provide our customers with further information regarding the uses and benefits of Your Subscription,
- enhance business productivity, including by creating useful business insights from that aggregated data and allowing You to benchmark Your business' performance against that aggregated data, and
- otherwise to improve Your Subscription.

## Personal information on servers is located in Sydney, Australia

All Data, including personal and non-personal information, that is entered into Your Subscription by You, or automatically imported on Your instruction, is transferred to Spotlight Reporting Limited's servers as a function of transmission across the Internet. By using Your Subscription, You consent to Your personal information being transferred to our servers as set out in this Policy.

Currently our servers are located in Sydney, Australia, and Your personal information will be routed through, and stored on, those servers as part of Your Subscription. If the location of

our servers change in the future, we will update this Policy. Review our Policy regularly to keep informed of any updates.

By providing Your personal information to Spotlight Reporting Limited, You consent to Spotlight Reporting Limited storing Your personal information on servers hosted in Sydney, Australia. While Your personal information will be stored on servers located in Sydney, Australia, it will remain within Spotlight Reporting Limited's effective control at all times. The server host's role is limited to providing a hosting and storage Subscription to Spotlight Reporting Limited, and we've taken steps to ensure that our server hosts do not have access to, and use the necessary level of protection for, Your personal information.

If You do not want Your personal information to be transferred to a server located in Sydney, Australia You should not provide Spotlight Reporting Limited with Your personal information or use the Subscription.

### Protection of Your personal information

Spotlight Reporting Limited is committed to protecting the security of Your personal information, and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure. Your personal information is stored on secure servers that have SSL Certificates. All Data transferred between You and the Subscription is encrypted.

However, the Internet is not in itself a secure environment therefore we cannot give an absolute assurance that Your information will be secure at all times. Transmission of personal information over the Internet is at Your own risk. You should only enter, or instruct the entering of, personal information to the Subscription within a secure environment.

We will advise You at the first reasonable opportunity upon discovering or being advised of a security breach where Your personal information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner.

### Disclosure of Your Personal Information in limited circumstances

Spotlight Reporting Limited will only disclose the personal information You have provided to us to entities outside the Spotlight Reporting Limited group of companies if it is necessary and appropriate to facilitate the purpose for which Your personal information was collected pursuant to this Policy, including the provision of the Subscription.

Spotlight Reporting Limited will not otherwise disclose Your personal information to a third party unless You have provided Your express consent. However, You should be aware that Spotlight Reporting Limited may be required to disclose Your personal information without Your consent in order to comply with any court orders, subpoenas, or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify You if we are required by law to disclose Your personal information.

The third parties who host our servers do not control, and are not permitted to access or use Your personal information except for the limited purpose of storing the information. This means that, for the purposes of Australian privacy legislation and Australian Subscribers, Spotlight Reporting Limited does not currently "disclose" personal information to third parties located overseas.

### Your credit card details

If You choose to pay for Your Subscription by credit card, Your credit card details are not stored by us and can only be accessed by authorised Spotlight Reporting Limited staff in limited circumstances. Your credit card details are encrypted and securely stored by Direct Payments Solutions Limited to enable Spotlight Reporting Limited to automatically bill Your

credit card on a recurring basis. You should review Direct Payment Solutions Limited's [Privacy Policy](#) to ensure You are happy with it.

## Access to Your personal information

It is Your responsibility to ensure that the personal information You provide to us is accurate, complete and up-to-date. Request access to information we hold about You, or request that we update or correct any personal information we hold about You, by sending Your request in writing to us at [support@spotlightreporting.com](mailto:support@spotlightreporting.com).

Spotlight Reporting Limited will process Your request as soon as reasonably practicable, provided we are not otherwise prevented from doing so on legal grounds. We will let You know why if we are unable to meet Your request. For example, it may be necessary for us to deny Your request if it would have an unreasonable impact on the privacy or affairs of other individuals, or if it is not reasonable and practicable for us to process Your request in the manner You have requested. It may be necessary for us to seek to arrange access to Your personal information through a mutually agreed intermediary (for example, the Subscriber).

We will only keep Your personal information for as long as we require it for the purposes of providing You with the Subscription. However, we may also be required to keep some of Your personal information for specified periods of time, for example under certain laws relating to corporations, money laundering, and financial reporting legislation.

## Spotlight Reporting Limited uses cookies

In providing Your Subscription, Spotlight Reporting Limited utilises "cookies". A cookie does not identify You personally or contain any other information about You but it does identify Your computer.

We and some of our affiliates and third-party Subscription providers may use a combination of "persistent cookies" (cookies that remain on Your hard drive for an extended period of time) and "session ID cookies" (cookies that expire when You close Your browser) on the Website to, for example, track overall site usage, and track and report on Your use and interaction with ad impressions and ad Subscriptions.

You can set Your browser to notify You when You receive a cookie so that You will have an opportunity to either accept or reject it in each instance. However, You should note that refusing cookies may have a negative impact on the functionality and usability of the Website.

We do not respond to or honour "Do Not Track" requests at this time.

## Email communications

Spotlight Reporting Limited sends billing information, product information, Subscription updates and Subscription notifications to You via email. Our emails will contain clear and obvious instructions describing how You can choose to be removed from any mailing list not essential to the Subscription. Spotlight Reporting Limited will remove You at Your request.

## Transfer of Your data to third-party applications

Your Subscription may allow You, the Subscriber, or another Invited User within the relevant subscription to the Subscription to transfer Data, including Your personal information, electronically to and from third-party applications. Spotlight Reporting Limited has no control over, and takes no responsibility for, the privacy practices or content of these applications. You are responsible for checking the privacy policy of any such applications so that You can be informed of how they will handle personal information.

## Privacy complaints process

If You want to complain about how we have handled Your personal information, please provide our Privacy Officer with full details of Your complaint and any supporting documentation:

- by e-mail at [jenny@spotlightreporting.com](mailto:jenny@spotlightreporting.com), or
- by letter to The Privacy Officer, Spotlight Reporting Limited, PO Box 2977, Wellington 6140, New Zealand.

Our Privacy Officer will endeavour to:

- provide an initial response to Your query or complaint within 10 business days, and
- investigate and attempt to resolve Your query or complaint within 30 business days or such longer period as is necessary and notified to You by our Privacy Officer.

## This policy may be updated from time to time

Spotlight Reporting Limited reserves the right to change this Policy at any time, and any amended Policy is effective upon posting to this Website. Spotlight Reporting Limited will make every effort to communicate any significant changes to You via email or notification via the Subscription. Your continued use of Your Subscription will be deemed acceptance of any amended Policy.

Last updated: June 2016