

Privacy Policy

This Privacy Policy describes Our policies and procedures on the collection, storage, use and disclosure of Your Personal Information.

We use Your Personal Information to provide and improve the Service. By submitting your Personal Information or using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

1. Interpretation and Definitions

1.1 The words of which the initial letter is capitalised have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

1.2 For the purposes of this Privacy Policy:

1.2.1 **Account** means a unique account created for You to access our Service or parts of our Service.

1.2.2 **Act** means the Privacy Act 2020.

1.2.3 **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Privacy Policy) refers to Takeoff Media Limited, t/a Pay It Now, Unit C, 38b Birmingham Drive, Middleton, Christchurch 8024.

1.2.4 **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

1.2.5 **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

1.2.6 **Personal Information** has the same meaning as in the Act and in essence is any information that relates to an identified or identifiable individual.

1.2.7 **PIN App** means the software application used for accessing the PIN Network, managing accounts on the PIN Network, storing the PIN Network Tokens of those account holders and facilitating transactions between participants on the PIN Network, as provided by us on the Website, or the Apple or Google Play app stores;

1.2.8 **PIN Network** means our technology system used to provide the functionality enabled by the PIN App;

1.2.9 **Service** refers to the services and other features, technologies and functionalities we provide, including via the PIN Network, the PIN App or the Website.

1.2.10 **Service Provider** means any natural or legal person who processes data on behalf of the Company. It refers to third-party companies or individuals engaged by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.

1.2.11 **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit), and includes such data referenced in clauses 2.3 to 2.5.

1.2.12 **Website** refers to <https://payitnow.io/>

1.2.13 **You** or **Your** means the individual accessing or using the Service.

2. **Collecting and Using Your Personal Information**

- 2.1 While using Our Service, We may ask You to provide Us with certain Personal Information that can be used to contact or identify You. The Personal Information may include, but is not limited to your name, gender, contact details, date of birth, ID documentation, address, payment information, account login information, security questions, financial information, banking details (to allow transactions to and from your account with us), wallet address and Usage Data.
- 2.2 Usage Data is collected automatically when using the Service.
- 2.3 Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages and unique device identifiers
- 2.4 When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use and unique device identifiers.
- 2.5 We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.
- 2.6 We may also collect any Personal Information contained in the content of Your communications with Us.
- 2.7 Where You are an individual, Your Personal Information may be collected from your organisation (where it has an account with Us on the PIN Network, and You are authorised to operate that account), or as otherwise permitted by the Act.
- 2.8 The Website or the PIN App may state other ways in which We collect Personal Information from You.
- 2.9 If You access the PIN App or Website from outside of New Zealand, You agree that any Personal Information You provide us is subject to this Policy and the Act.
- 2.10 If You do not provide the Personal Information We ask You to provide at the time it is requested (or within any time period we specify for providing it), or the information is incorrect, You may not be able to use the Service, log into Your account on the PIN Network, and We may not be able to provide any requested services, process transactions, respond to an enquiry, or contact You.

3. **Anti-Money Laundering and Countering Financing of Terrorism Act 2009**

- 3.1 For some participants in the PIN Network we are required by the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and associated regulations (**AML/CFT**) to meet the requirements for client due diligence which involve, where You are such a participant, requesting information from You to (i) understand the nature and purpose of Your engagement of the Service, and (ii) verify Your identity and undertake other identity related checks, and (iii) verify source of wealth or source of funds if required.
- 3.2 The AML/CFT also requires Us to take a copy of documents verifying Your identity, including Your full name and date of birth. In some circumstances, we are required to take a copy of documents verifying your residential address. If these documents are not provided to Us, You will not be able to use the PIN App or Website to establish an account on the PIN Network with Us.

- 3.3 We use the requested information (**AML information**) for identity related checks and to check that We are not prohibited from accepting You to use the Service. All such use of the AML information is limited to compliance with Our obligations under the AML/CFT and any other applicable law.

4. **Third parties**

- 4.1 If You provide Personal Information relating to another person, either within Your organisation or otherwise, You warrant that You are authorised to do so and that You have ensured the individual is aware of the information in this Privacy Policy. If You provide Us Personal Information about others, or if others give Us Your information, We will only use that information as set out in this Policy or for any specific reason for which it was provided to Us, or as otherwise permitted under the Act.
- 4.2 We may use social media services like Facebook, Telegram, LinkedIn, Reddit, Instagram, Discord and Twitter. Your use of these third party services is entirely optional. We may make use of any information that You make public relating to Our business, when You use any such third party service, for the purpose of Our business.
- 4.3 The Website and/or PIN App may contain links to other third party websites that may collect Personal Information about You, including links to decentralised exchanges PYE Swap and Pancake Swap and to providers that facilitate the purchase of PIN Network Tokens such as Simplex and Ramp. Those third parties may require You to have an account with them to use their service.
- 4.4 If You click on a third party link or use the App to access a third party service, You will be directed to that third party's site or application. All third party services are governed by the privacy policies and/or practices of the relevant third party, for which We are not responsible. We strongly advise You to review the privacy policy of every site or application You visit or use. If You do not want to provide Personal Information to any of those third parties, or make information publicly available, You should not use their particular service.

5. **Tracking Technologies and Cookies**

- 5.1 We use Cookies and similar tracking technologies to track the activity on the PIN App and the Website and store certain information.
- 5.2 Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Service. The technologies We use may include:
- 5.2.1 **Cookies or Browser Cookies:** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of Our Service. Unless You have adjusted Your browser setting so that it will refuse Cookies, Our Service may use Cookies.
- 5.2.2 **Web Beacons.** Certain sections of Our Website, the PIN App and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).
- 5.3 Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

- 5.4 We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

- (a) Type: Persistent Cookies
- (b) Administered by: Us
- (c) Purpose: These Cookies identify if users have accepted the use of cookies on the Website.
- (a) Type: Persistent Cookies
- (b) Administered by: Cloudflare
- (c) Purpose: These Cookies function as a security mechanism in providing access to the Website.

Functionality Cookies

- (a) Type: Persistent Cookies
- (b) Administered by: Us
- (c) Purpose: These Cookies allow Us to remember choices You make when You use the Website, such as remembering Your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter Your preferences every time You use the Website.

- 5.5 We use analytics and performance cookies to view site traffic, activity and other data. We currently use Google Analytics for analytics purposes. While Google is primarily collecting data on Our behalf, it may also use the data which is collected for its legitimate business interests, including to improve its own services, and to maintain the security of its systems. To understand the ways that Google Analytics may use Your data, please read its policy available [here](#).

- 5.6 For more information about the cookies, including how to see what cookies have been set, visit www.aboutcookies.org.

6. Use of Your Personal Data

- 6.1 The Company may use Your Personal Information for the following purposes:

- 6.1.1 To provide and maintain Our Service, including to monitor the usage of Our Service.
- 6.1.2 To verify Your identity.
- 6.1.3 To optimise Your experience as a user of the PIN App and/or user of the Website, including for the purpose of staff training and quality control.
- 6.1.4 To manage Your account on the PIN Network, and Your registration as a user of the Service. The Personal Information You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- 6.1.5 For the performance of a contract, the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

- 6.1.6 To contact You, including by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- 6.1.7 To provide You with news, special offers and general information about other goods, services and events which We offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information.
- 6.1.8 To conduct Our business, which may include reviewing, analysing and improving our own processes and developing new products or services.
- 6.1.9 To attend to and manage Your requests to Us.
- 6.1.10 For business transfers, for example, We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganisation, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Us about our Service users is among the assets transferred.
- 6.1.11 To take any action in any case of dispute, or legal proceeding of any kind between You and Us, or between You and any other person with respect to Our business.
- 6.1.12 To comply with Our legal obligations.
- 6.2 We may also use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of Our promotional campaigns and to evaluate and improve Our Service, products, services, marketing and your experience.
- 6.3 We may also collect and use Your Personal Information in any circumstances authorised by the Act, or in any other manner with Your consent.
- 7. Other Disclosures of Personal Information**
- 7.1 We may share Your Personal Information in the following situations:
 - 7.1.1 For AML/CFT compliance: We may share Your Personal Information with any third party to identify or verify your identity and/or to undertake anti-fraud or money-laundering and terrorism financing checks;
 - 7.1.2 With Service Providers: We may share Your personal information with Service Providers to monitor and analyse the use of Our Service, and to contact You.
 - 7.1.3 For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
 - 7.1.4 With Your consent: We may disclose Your personal information for any other purpose with Your consent.
- 7.2 We may transfer Personal Information to Service Providers to perform services on Our behalf, to process the information for Us, or hold it on Our behalf. These third parties may be offshore, but We will not authorise them to use such information for their own purposes.
- 7.3 We may use third party payment providers to facilitate payments and transfers of cryptocurrencies you may wish to make or receive via the PIN App. We currently use a range of third party providers for this purpose, including Simplex, Binance, Ramp, Stripe and EasyCrypto. The payment provider will collect and hold the payment information You

provide to it in respect of Your transaction. The payment provider will then provide or make available to Us the information collected by it as required to enable Us to confirm a payment or transfer. Any credit card details stored for payments are done so on the payment provider's system. No credit card information is stored by Us. We may change Our provider at any time. Some of these providers may require you to create an account with them in order to use the service they provide. Paragraphs 4.3 and 4.4 of this Privacy Policy apply to the use of third party providers that collect Personal Information directly from You.

- 7.4 While We endeavour to only use third parties that protect Your Personal Information in a way that is comparable to the safeguards in the Act, that is not always possible. You authorise Us to disclose your Personal Information to third parties as set out in this Policy even though those third parties may not be required to protect the information in a way that, overall, provides comparable safeguards to those in the Act.
- 7.5 We do not otherwise share Your Personal Information without Your consent, except where permitted by the Act, unless We believe it is necessary:
- 7.5.1 to enforce Our terms and conditions, or where We are legally required to do so;
 - 7.5.2 for Us or other authorised agencies to detect, investigate, prevent or address fraud, security or technical issues; or
 - 7.5.3 to otherwise protect our property, legal rights, or that of others.
- 7.6 Except as otherwise stated in this Policy, Your Personal Information We collect is held by Us. Our address is set out below.
- 7.7 We may use and disclose Your Personal Information for any of these purposes, in any circumstances authorised by the Act, or in any other manner with Your consent.

8. Retention of Your Personal Information

- 8.1 The Company will retain Your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We may also retain Your Personal Information for as long as needed to manage backups of your Personal Information in accordance with Our security practices, and to be able to address any claim that might be made after you cease to be a user of Our Service. We will retain and use Your Personal Information to the extent necessary to comply with Our legal obligations (for example, if We are required to retain Your information to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies.
- 8.2 The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.
- 8.3 Where we no longer require Your Personal Information for a permitted purpose under the Act, we will take reasonable steps to return, delete or destroy it.

8.4 Access and Correction

- 8.5 You have the right to request access to, and correction of, Your Personal Information. To request access to or correction of any of Your Personal Information, please contact Us using the details below.
- 8.6 We endeavour to ensure that the Personal Information We hold is accurate, complete and up-to-date. If any of the Personal Information that You have provided to Us changes We encourage You to contact Us to update that Personal Information.

- 8.7 If a dispute arises between You and Us and We cannot resolve it with You, then You may wish to contact the Office of the Privacy Commissioner on investigations@privacy.org.nz.

9. **Transfer of Your Personal Information**

- 9.1 Your information, including Personal Information, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of New Zealand where the data protection laws may differ than those of the Act.
- 9.2 Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.
- 9.3 The Company will take all steps reasonably necessary to ensure that Your Personal Information is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Information will take place to an organisation or a country unless there are adequate controls in place including the security of Your Personal Information.

10. **Security of Your Personal Data**

- 10.1 The security of Your Personal Information is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Information, We cannot guarantee its absolute security.

11. **Children's Privacy**

- 11.1 Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Information, please contact Us. If We become aware that We have collected Personal Information from anyone under the age of 18 without verification of parental consent, We take steps to remove that information from Our servers.
- 11.2 If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

12. **Links to Other Websites**

- 12.1 Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.
- 12.2 We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

13. **Changes to this Privacy Policy**

- 13.1 We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.
- 13.2 We will let You know via email and/or a prominent notice on Our Website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.
- 13.3 You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page and your continued use of the Service signifies your agreement to those changes.

14. **Contact Us**

15. If you have any questions about this Privacy Policy, You can contact Us by email:

Email: info@payitnow.io

Address: Pay It Now, Unit C, 38B Birmingham Drive, Middleton, Christchurch

16. **Governing Law**

16.1 This Policy is governed by the laws of the New Zealand.