



# Privacy Policy

Tourism Holdings Limited

Effective 17 June 2026



creating unforgettable holidays



## 1. INTRODUCTION

This Notice and Privacy Policy explains how we process your personal data as well as your rights associated with that data.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can contact [privacy@thlonline.com](mailto:privacy@thlonline.com)

## 2. WHO ARE WE?

- 2.1 Tourism Holdings Limited (**thl**) is a global family of RV brands delivering the most enriching way to experience the world. We are listed on the New Zealand and Australian Stock Exchanges. We believe in championing a way of traveling that creates true value for the people, places, and environments we touch. Together, we are more vertically integrated, globally connected, and ambitious than anyone else in RV. We design and build. We rent. We sell. We deliver to hundreds of thousands of customers every year across our operations in New Zealand, Australia, USA, and Canada. Amplified by our connections into the broader tourism industry and manufacturing sectors. Collectively we represent over 30 brands, each with strong brand equity and local heritage in the markets they operate.
- 2.2 Tourism Holdings Limited (**thl**) is the data controller for the purposes of this policy. The thl group of companies is referred to as the thl group. For any privacy related enquiries contact our data protection steward at [privacy@thlonline.com](mailto:privacy@thlonline.com).
- 2.3 We also use a network of independent agents and licensees when providing our services around the world. Please note that those agents and licensees are not covered by this Policy, and we are not responsible for the privacy practices of any agent, licensee or other third party with whom you may transact before or at the same time as using our products or services.

## 3. THE DATA WE COLLECT ABOUT YOU

- 3.1 The data we collect and may have collected in the last 12 months will depend on how we have interacted with you and what services and products you have requested from us over time. We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:
  - (a) **Identity Data (including audio and sensitive)** includes first name, last name, username or similar identifier, title, date of birth, age, gender, driver's licence, passport details, security camera recordings and recordings of telephone conversations.
  - (b) **Contact Data** includes address, telephone numbers and email address.
  - (c) **Financial Data (commercial information)** includes payment card details. We do not store any customer credit/debit card information as this is managed by a payment gateway provider who are PCDI DSS compliant.

- (d) **Transaction Data (commercial information)** includes details of your previous bookings with us, payments to and from you and other details of products and services you have purchased from us.
- (e) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- (f) **Location Data (geolocation)** includes global position system vehicle tracking and diagnostics (telematics) and other location information obtained from smartphones, tablets, sat-navs or other devices that monitor your current and previous geographic locations.
- (g) **Profile Data (including inferences)** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses. Data related to any programme membership.
- (h) **Usage Data (Internet or other electronic network activity information)** includes information about how you use our website, products, and services.
- (i) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. Data shared for any market research, surveys, or competitions.
- (j) **Vehicle-sourced Data** includes information collected by data systems within a vehicle about its condition and performance (including mileage, fuel, and other operational data) and your operation of the vehicle, including your speed, time, fuel consumption and distances travelled.

3.2 We also collect, use, and share **Aggregated Data** such as statistical or demographic data. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat that combined data as personal data which will be used in accordance with this Privacy Policy.

3.3 We do not collect any information about criminal convictions and offences, although we may be required to briefly hold and pass on any driving infringements that you incur while renting our vehicles.

3.4 **Refusal to provide your personal data:** You do not have to provide your personal data when we request it, but if you choose not to, we may not be able to respond to your queries and perform any contract we have or are trying to enter into with you (for example, to provide you with a rental vehicle). That may mean we have to cancel a product or service you have with us. We will notify you at the time if that is the case.

#### 4. HOW WE COLLECT AND HOLD YOUR PERSONAL DATA

4.1 We use different methods and sources to collect personal data from and about you including through:

- (a) **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms on our websites and mobile applications, on third-party websites or in paper form or by corresponding with us by post, phone, email or otherwise. That includes personal data you provide when you:
  - (i) make an inquiry or booking with us or otherwise apply for any of our products or services.
  - (ii) purchase a product or service from us.
  - (iii) create an account on our website or mobile applications.
  - (iv) subscribe to our services or publications.
  - (v) request marketing to be sent to you.
  - (vi) enter a competition, promotion, or survey (including on third party social media platforms).
  - (vii) give us feedback or enter our premises on which security cameras are operating.
  - (viii) speak to us on the telephone.
- (b) **Automated technologies or interactions.** As you interact with our website and mobile applications, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. If you are in the European Economic Area, the United Kingdom, or Switzerland, please see our cookie policy [here](#) for further details. We may combine Technical Data (some of which will be anonymous) with other personal data we have collected from you in order to understand and measure your online experiences and determine what products, promotions and services are likely to be of most interest to you.
- (c) **Third parties or publicly available sources.** We may receive personal data about you from various third parties and certain public and technical sources:
  - (i) **Technical Data** from analytics providers such as Google and advertising networks such as Facebook and Identity, Location and Vehicle Sourced Data when using our vehicles.
  - (ii) **Identity and Contact Data** when you make a booking or apply for our products or services through a third party (such as a travel agent), we use that data for the purposes and activities set out in section 5.1 below and may share that data with the entities listed in section 8.1 of this Privacy Policy.

- (iii) **Identity and Contact Data** may be collected about you from a driver of our vehicles if you are involved in an accident involving one of our vehicles, for the purpose of managing and processing insurance claims. We may disclose this information to our insurers and, where necessary, to law enforcement agencies in connection with the accident.
  - (iv) **Identity and Contact Data** through interactions (including transactions) with our service providers, business partners, agents, affiliates and subsidiaries (including other travel providers and insurance companies),
  - (v) **Identity and Contact Data** from data brokers or aggregators such as Facebook and from publicly available sources such as phone directories, membership lists, professional and trade associations, government, bankruptcy or court registry searches and electoral registers.
- (d) **Unsolicited personal data.** If we receive personal data that we have taken no active steps to collect (such as a customer complaint or testimony that has been sent with personal information), then we may keep that personal data if it is reasonably necessary for one or more of our functions or activities.

4.2 We hold your personal information in hardcopy and electronic form. Further detail about the security measures we have in place is set out in section 11 below.

## 5. WHY WE COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL DATA

5.1 We will collect, hold, use and/or disclose your personal data where permitted by law, and only to the extent reasonably necessary and proportionate in the circumstances and for the purposes set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing where required
<b>New customers:</b> To register you as a new customer and to respond to your inquiries and any complaints	(a) Identity (b) Contact (a) Profile	(a) Performance of a contract with you
<b>Facilitate bookings:</b> To provide and store quotes for retrieval and to process bookings including: <ul style="list-style-type: none"> <li>• managing payments, fees, and charges</li> <li>• collecting and recovering money owed to us</li> </ul>	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
<b>Provide products and services:</b> To provide our products and services to you, including: <ul style="list-style-type: none"> <li>• renting vehicles to you</li> </ul>	(a) Identity (b) Contact	(a) Performance of a contract with you

Purpose/Activity	Type of data	Lawful basis for processing where required
<ul style="list-style-type: none"> <li>managing our fleet of vehicles</li> <li>operating guided tours</li> </ul>	(c) Profile (d) Financial (e) Transaction (f) Marketing and Communications	(b) Necessary for our legitimate interests to recover debts due to us and to contact you in relation to a service update or respond to an issue you have asked us to help with.
<b>Relationship management:</b> To manage our relationship including: <ul style="list-style-type: none"> <li>notifying you about changes to our terms or Privacy Policy</li> <li>asking you to leave a review or take a survey</li> <li>keeping you up to date with our latest news</li> </ul>	(a) Identity (b) Contact (c) Profile (a) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation. (a) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
<b>Improve services:</b> To constantly improve our products and services, tailor them to your needs, develop new product/service ideas and inform you of any changes to our products/services	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to keep developing and improving our products/services in line with customer expectations
<b>Promotions:</b> To enable you to: <ul style="list-style-type: none"> <li>participate in prize draws, competitions, and giveaways</li> <li>know about special offers and promotions, including on social media</li> </ul>	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business
<b>Technical maintenance:</b> To administer and protect our business, content, websites, and mobile apps including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security and to prevent fraud.

Purpose/Activity	Type of data	Lawful basis for processing where required
data and monitoring for unauthorised use	(e) Marketing and Communications (f) Transaction (g) Location	(b) Necessary to comply with a legal obligation. (c) Performance of a contract with you
<b>Advertising:</b> To deliver relevant website content and advertising to you and measure the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests to define types of customers for our products/services, to keep our website updated and relevant, to develop business and to inform our marketing strategy
<b>Data analytics:</b> To perform data analysis to: • improve and personalise your experience on our platforms • improve our products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Identity (d) Profile (e) Marketing and Communications	(a) Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy
<b>Promote our products and services:</b> To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Location (g) Marketing and Communications	(a) Necessary for our legitimate interests to develop our products/services and grow our business. (b) subject to your consent
<b>Safety and security:</b> to track vehicle location and provide real-time safety alerts to customers (such as low bridge warnings), notifications of access to unauthorised territories, information about points of	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation.

Purpose/Activity	Type of data	Lawful basis for processing where required
tourism interest, to contact you about security, safety and/or operational issues we have identified from the data collected, and to understand and manage the performance, location and security of our vehicle fleet and to assist with the management of accident claims involving our vehicles.	(d) Location (e) Vehicle-sourced data (f) Usage	(c) Necessary for our legitimate interests to help reduce vehicle damage and ensure the safety of our customers

## 6. MARKETING

- 6.1 We aim to provide you with choices about how your personal data is used for marketing and advertising purposes.
- 6.2 You will only receive marketing communications from us if you have opted in or consented to receiving those communications. We may use your personal data collected in those circumstances to contact you and keep you up to date with the latest news, events, special offers and promotions of our brands, including by email, text messages or post.
- 6.3 You can update your subscription preferences or unsubscribe from marketing communications at any time by following the update preferences or unsubscribe instructions provided in each such communication. Alternatively, you can contact us at [privacy@thlonline.com](mailto:privacy@thlonline.com). Once you do this, we will update our records to ensure that you do not receive further marketing messages.
- 6.4 We may display advertising for you to see on third party websites, including social media sites such as Facebook. We do this by matching information about your activity on **thl** group websites with information collected on third party sites. That may involve using your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you.

## 7. CHANGE OF PURPOSE

- 7.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider we need to use it for another reason directly related to and/or compatible with the original purpose, and such secondary purpose is permitted under law. If you wish to get an explanation as to how the processing for the secondary purpose is directly related to and/or compatible with the original purpose, please contact us.
- 7.2 Please note that we may process your personal data without your knowledge or consent, in compliance with the terms of this Privacy Policy, where this is required or permitted by law.

## 8. HOW WE SHARE YOUR PERSONAL DATA

8.1 We may have to share your personal data with the following parties for the purposes set out in the table in section 4.1 above or for other purposes directly related to the purpose for which the information was collected.

- (a) **thl group companies:** Other companies in the **thl** group acting as controllers or processors and who are based in Australia, New Zealand, the United States, and the Canada and provide IT, storage and system administration services and undertake leadership reporting.
- (b) **Service providers:** Contracted third parties providing the following services:
  - (i) data processing
  - (ii) IT and system administration
  - (iii) marketing, market research and communication
  - (iv) printing and distribution of marketing materials
  - (v) mailing, freight, and courier
  - (vi) price comparison websites
  - (vii) Professional advisers acting as processors or controllers, including lawyers, bankers, auditors, consultants, insurers, and recruiters.
- (c) **Other third parties:**
  - (i) regulators and other authorities acting as processors or controllers who require reporting of processing activities in certain circumstances and/or where disclosure is required by law
  - (ii) third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy
  - (iii) other entities in the same or similar industries to us, for reasons of public safety
  - (iv) where the law requires or authorises us to do so
  - (v) other third parties that you have been informed of at the time any information is collected from you.

## 9. INTERNATIONAL TRANSFERS

9.1 As a global company we operate our business in multiple regions and countries. This means we collect, store, process and transfer personal information across borders including countries outside your region or the European Economic Area, Switzerland,

and the United Kingdom (EEA+). For the most part, your personal data is collected, stored, and processed outside the EEA+ with data centres in Australia, Canada and the USA.

- 9.2 Certain entities in the **thl** group may collect personal data inside the EEA+.
- 9.3 If we transfer your personal data out of the EEA+, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.
- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the relevant EEA+ body.
  - (b) Where we have entered into approved standard contractual clauses with the recipient to give personal data the same protection it has in the EEA+.
  - (c) Where we use providers based in the US, we may transfer data to them if they are part of the EU-U.S. Data Privacy Framework, the UK Extension to the EU-US Data Privacy Framework, or the Swiss-US Data Privacy Framework which requires them to provide similar protection to personal data shared between the EEA+ and the US.
- 9.4 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA+ as per the contact details in section13.
- 9.5 For individuals residing outside of the EEA+, if we disclose any of your personal data to a foreign entity established outside of the jurisdiction in which the personal data is collected, we will comply with any applicable laws relating to the offshore disclosure of such personal data.
- 9.6 For individuals located in Australia, and as described in this Privacy Policy, we may disclose personal information to **thl** group companies and service providers located overseas, including in New Zealand, the United States, Canada and the United Kingdom. Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure that the recipient does not breach the Australian Privacy Principles in relation to that information.

## 10. YOUR RIGHTS

- 10.1 Depending on the privacy laws applicable in the jurisdiction in which you reside, you may have the following rights in relation to your personal data.
- (a) **Access/right to know:** you can request access to a copy of the personal data we hold about you and to check that we are lawfully processing it.
  - (b) **Rectification/right to correct:** you can request that any incomplete or inaccurate data we hold about you is corrected, though we may need to verify the accuracy of the new data you provide to us.

- (c) **Erasure/right to delete:** when your data is no longer needed for the purposes for which it was provided, we will delete it. You can ask us to delete or remove your personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) **Object to processing:** where we are relying on a legitimate interest (or those of a third party) and you believe our processing of your personal data impacts your fundamental rights and freedoms, you may object to such processing for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.
- (e) **Restrict processing/right to limit:** you can ask us to suspend the processing of your personal data: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. We do not use or disclose sensitive personal information that is subject to Cal. Civil Code 1798.121 for purposes other than those specified in Cal. Civil Code 1798.121(a).
- (f) **Data portability:** you can request that your personal data is transferred to you or a third party. We will provide you or a third party you have chosen with your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.
- (g) **Withdraw consent:** you may withdraw your consent to our processing of your personal data. If you do so, we may not be able to provide certain products or services to you. We will advise you if that is the case when you withdraw your consent.
- (h) **Opt-out (Australia, Canada and United States):** In Australia, Canada and some states in the United States, you may have the right to opt out of (i) targeted advertising, (ii) the sale or sharing of personal data for cross-context behavioural advertising,<sup>1</sup> or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. To provide you with more interesting and customized information, promotions, and advertising, we disclose and have in the past 12 months disclosed Technical Data and Usage Data to third-party providers of advertising services who may use such personal data for their own

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purposes or to serve other customers, including to display our advertisements to you on sites and services that we do not operate and which is considered "selling" or "sharing" under the laws of some states. If you reside in Australia, Canada and certain states in the United States, you have (or will soon have) the right to opt out of the use of your personal data for these targeted advertising or cross-context behavioral advertising purposes. To submit such a request, please click the following link: [Do Not Sell or Share My Personal Information: Your Opt-Out Rights](#), in which case we will respond to your request in accordance with applicable law. We respond to opt-out preference signals communicated via the Global Privacy Control as legally required and in such case will process such signals with respect to the browser or device communicating the signals, or with respect to you specifically if you have signed onto your **thl** account while communicating Global Privacy opt-out preference signals. To use Global Privacy Control opt-out preference signals, please follow the instructions here: <https://globalprivacycontrol.org/>. We do not have actual knowledge that we sell or share for cross context behavioural advertising, the personal information of California residents under 16 years of age.

- (i) **Non-discrimination:** California residents have a right not to be discriminated against for exercising privacy rights under the California Consumer Privacy Act including in some cases non-retaliation rights.
- (j) If you reside in certain U.S. states, you may also have the right to request from us a list of the specific third parties, other than individuals, to whom we have disclosed your personal data.

10.2 The rights and options described above are subject to limitations and exceptions under applicable law. We will respond to your requests to exercise your privacy rights in accordance with applicable law. We may request additional information from you to verify your identity and complete your request. If we deny your request, we will explain why. In some states in the United States, you have the right to appeal our denial of your request, which you may exercise by responding to the message we send to you communicating our denial stating that you appeal our decision. In these cases, we will reconsider your request and then notify you of our decision.

10.3 If you wish to exercise any of the rights set out above, please contact our data protection steward (see section 13below).

10.4 **No fee usually required:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive and it is permissible under local law to do so. Alternatively, we may refuse to comply with your request in these circumstances if permitted by applicable local law. If we choose to deny your request, we will inform you of the decision and if applicable your right to complain to a supervisory authority within the statutory deadlines, which is generally 1-month from the date of the request.

- 10.5 **What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure that personal data is not disclosed to any person who has no right to receive it.
- 10.6 **Agents.** Subject to authentication requirements, U.S. residents can designate an authorized agent to make a request on your behalf and agents can submit the request. Please click the following link: [Do Not Sell or Share My Personal Information: Your Opt-Out Rights](#).
- 10.7 **Time limit to respond:** We respond to all legitimate requests as legally required without undue delay and normally at the latest within 30 days. Occasionally, if your request is particularly complex or you have made a number of requests, we may need to extend this by up to a period of two months or such other timeframe as may be permitted by applicable law, in which case we will notify you and keep you updated.

## 11. PROTECTING YOUR PERSONAL DATA

- 11.1 We have put in place security measures to protect your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will process your personal data on our instructions, and they are subject to a duty of confidentiality. We regularly review our security procedures to consider new technologies and methods.
- 11.2 We have put in place procedures to deal with suspected personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 12. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

- 12.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.
- 12.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

## 13. CONTACT DETAILS

- 13.1 **EEA Supervisory Authorities:** If you are an European Economic Area data subject and feel that your personal data has been processed in a way that does not comply with the General Data Protection Regulation (GDPR), you may lodge a complaint with the relevant supervisory authority in your country. We would, however, appreciate the

chance to deal with your concerns before you approach them, so please contact us in the first instance.

13.2 **Australian privacy complaints:** If you are located in Australia and believe that we have breached the *Privacy Act 1988* (Cth) or an Australian Privacy Principle, you may make a complaint by contacting our data protection steward (see contact details below). We will investigate the complaint and respond within a reasonable period. If you are not satisfied with our response, or if we do not respond within a reasonable time, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) via [www.oaic.gov.au](http://www.oaic.gov.au) or by calling 1300 363 992.

13.3 **Data Protection Steward:** Tourism Holdings Limited have appointed a data protection steward who is responsible for overseeing privacy issues for the **thl** group. If you have any questions or complaints about this Privacy Policy, including any requests to exercise your rights in relation to your personal data, please contact the steward using the details set out below.

(a) Email address: [privacy@thlonline.com](mailto:privacy@thlonline.com)

(b) Postal address: PO Box 4293, Shortland Street, Auckland, New Zealand 1140

(c) Telephone number: +64 9 336 4299

13.4 **EU Representative:** Tourism Holdings Limited have appointed an EU Representative whose tasks are to serve as a contact person for supervisory authorities and data subjects and can be contacted as follows:

(a) Name: Stephen Hart

(b) Email address: [eu.gdpr@thlonline.com](mailto:eu.gdpr@thlonline.com)

## 14. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

14.1 This version was last updated on 13<sup>th</sup> May 2026.

14.2 We reserve the right to update and change this Privacy Policy at any time by posting changes on this webpage or applicable mobile apps. Changes will take effect from the time they are posted. We will use reasonable endeavours to communicate those changes to you on our website and mobile apps or via other channels that we think are suitable.

14.3 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 15. GLOSSARY

15.1 **Comply with a legal or regulatory obligation** means processing your personal data where that is necessary for compliance with one of more of our legal or regulatory obligations.

- 15.2 **Data controller** means whomever determines the purposes and means of processing personal data.
- 15.3 **Legitimate Interest** means our interests in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- 15.4 **Performance of Contract** means processing your data where that is necessary under a contract with you or to take steps at your request before entering into such a contract.
- 15.5 **Personal data** (also referred to as **personal information**) means any information or opinion relating to an identified individual, or an individual who is reasonably identifiable, whether directly or indirectly. This includes information that identifies an individual or could reasonably be used to do so. It does not include anonymous data where the identity of the individual has been removed.
- 15.6 **Processing** means any operation or set of operations performed on personal data.
- 15.7 **Processor** means the entity that processes personal data on behalf of the controller.