

We are bound by the *Privacy Act 2020* (NZ) (**Privacy Act**) and the New Zealand Privacy Principles (**NZPPs**). This policy explains how and why we collect, use, hold and disclose the personal information of participants (including athletes, volunteers and accredited media) at all our New Zealand events (including IRONMAN®, IRONMAN 70.3®, triathlon, running and multi-sport events).

"We", "us" and "our" means IRONMAN New Zealand Limited NZBN 9429034266335 of Level 1, 347 Parnell Road, Parnell, Auckland, 1052, New Zealand.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

What is personal information?

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

What personal information do we collect and hold?

We collect information about you and your interactions with us, for example, when you register for our events (as an athlete or volunteer, or seek accreditation as a member of the media), purchase any of our products through our event registration process, call our customer support line or otherwise visit our website. The information we collect from you may include your identity and contact details, your history of purchases, your use of our products and services, and details of enquiries or complaints you make. If you are an athlete at an event the information we collect from you may also include your relevant medical history and race results.

We may collect information about how you access, use and interact with the website. We do this by using a range of tools such as analytics cookies, advertising cookies, social media cookies and mobile devices. This information may include:

- (a) the location from which you have come to the site and the pages you have visited; and
- (b) technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

We use cookies on the website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

Why do we collect, hold and use your personal information?

We collect, hold and use your personal information so that we can:

- (a) facilitate your safe participation in and engagement with our events;
- (b) provide you with products and services, and manage our relationship with you;
- (c) contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- (d) comply with our legal obligations and assist government and law enforcement agencies or regulators; or
- (e) identify and tell you about other products or services that we think may be of interest to you.

If you do not provide us with your personal information we may not be able to register you for an event, provide you with our services, communicate with you or respond to your enquiries.

How do we collect your personal information?

We will collect your personal information directly from you whenever you interact with us.

We may also collect information from third parties such as our social media platforms (Facebook, Instagram) and our event affiliates (FinisherPix for event photographs, Active Network LLC and its affiliates or Register Now Pty Ltd for event registrations, any timing service providers for an event and, where you have chosen to use such service, any charity partner or charity platform for the event such as everydayhero).

How do we store and hold personal information?

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- (a) the use of identity and access management technologies to control access to systems on which information is processed and stored;
- (b) requiring all employees to comply with internal information security policies and keep information secure;
- (c) requiring all employees to complete training about information security; and
- (d) monitoring and regularly reviewing our practise against our own policies and against industry best practice.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the NZPPs.

Who do we disclose your personal information to, and why?

We may transfer or disclose your personal information to our related companies, including (without limitation): USM Events Pty Ltd trading as IRONMAN Australia located at Level 6, 222 Kings Way, South Melbourne, Victoria, 3205, Australia; and World Triathlon Corporation located at 3407 W. Dr. Martin Luther King Jr. Blvd., Suite 100, Tampa, Florida, 33607, United States.

We may disclose personal information to external service providers so that they may perform services for us or on our behalf.

We may also disclose your personal information to others outside our group of companies where:

- (a) we are required or authorised by law to do so;
- (b) you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- (c) we are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

Do we disclose personal information to overseas recipients?

We may disclose your personal information to recipients which are located outside New Zealand.

Those recipients are likely to be located in Australia and/or the United States.

Do we use your personal information for marketing?

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by us, our related companies, our other business partners or our service providers.

Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

Access to and correction of your personal information

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. Any such request may require identity verification to ensure the security of your personal information. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date and complete.

Your rights under the EU GDPR if you are located in the European Union

Under the European Union (EU) General Data Protection Regulation (GDPR), as a data subject you have the right to:

- (a) access your data;
- (b) have your data deleted or corrected where it is inaccurate;
- (c) object to your data being processed and to restrict processing;
- (d) withdraw consent to having your data processed;
- (e) have your data provided in a standard format so that it can be transferred elsewhere; and
- (f) not be subject to a decision based solely on automated processing.

Data Subject Rights

We have processes in place to deal with Data Subject Rights requests. Our actions and responsibilities will depend on whether we are the controller or processor of the personal data at issue. Depending on our role as either a controller or processor, the process for enabling Data Subject Rights may differ, and are always subject to applicable law. Please refer to the Contact Details section of this policy if you would like to make a Data Subject Rights request or have a specific need for assistance with a Data Subject Rights request.

Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Privacy Commissioner (www.privacy.org.nz) for guidance on alternative courses of action which may be available.

Contact details

If you have any questions, comments, requests or concerns, please contact us at: oceprivacy@ironman.com.

Changes to this policy

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.