

Privacy Policy

Effective Date: June 9th, 2025

1. Introduction

CEM NZ ("we," "our," or "us") is committed to protecting your privacy and personal information. This Privacy Policy explains how we collect, use, store, and protect your personal information in accordance with the Privacy Act 2020 (New Zealand).

Our Legal Commitment: We handle your personal information in compliance with New Zealand privacy law and give effect to internationally recognised privacy obligations and standards, including the OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data.

2. What Information We Collect

2.1 Information Collection Standards

We collect your personal information using methods that are:

- **Fair:** Using only reasonable and appropriate collection methods
- **Legal:** Complying with all applicable privacy laws and the 13 Information Privacy Principles
- **Transparent:** Clearly explaining what we collect and why

2.2 Information You Provide

- **Customer Information:** Name, email address, phone number, billing and shipping addresses
- **Payment Information:** Credit card details, billing information (processed securely through our payment providers)
- **Order Information:** Products purchased, order history, preferences
- **Communication:** Messages sent through contact forms, emails, or customer service interactions
- **Vehicle Information:** Make, model, year (optional - only when you choose to provide it for product recommendations or in reviews)

2.3 Information Automatically Collected

- **Website Usage:** Pages visited, time spent, browser type, device information
- **Google Analytics:** Website performance data, user behavior patterns, traffic sources
- **Wix Platform Data:** Our website is built on Wix.com, which automatically collects certain technical data as described in Wix's Privacy Policy
- **Cookies & Tracking:** Website performance data, user preferences (see our Cookie Policy section below)
- **IP Address:** For security and geographic location (general area only)

2.4 Information from Third Parties

We collect personal information directly from you wherever possible. We may collect information from other sources only when necessary:

- **CEM Australia:** Order confirmation and shipping updates for products dropshipped directly to you
- **Payment Processors:** Transaction confirmation and fraud prevention data
- **NZ Post:** Delivery confirmation and tracking information
- **Social Media:** If you interact with our social media pages (public information only)

Transparency: When we collect information from sources other than you, we will inform you of the sources used and circumstances of collection.

3. How We Use Your Information

3.1 Data Use Standards

We use your personal information responsibly by:

- Using information only when it's relevant to the specific purpose
- Ensuring collection is necessary for our lawful business purposes
- Considering the accuracy and completeness of data before making decisions

3.2 Primary Purposes

- **Order Processing:** Fulfilling orders, processing payments, arranging delivery
- **Customer Service:** Responding to inquiries, resolving issues, providing support
- **Product Recommendations:** Suggesting suitable products based on your vehicle or purchase history
- **Account Management:** Managing your account, order history, and preferences

3.3 Communication Purposes

- **Order Updates:** Shipping notifications, delivery confirmations, order status
- **Customer Support:** Responding to questions about products or orders (primarily via email)
- **Marketing Communications:** Product information, promotions, automotive tips (only with your explicit consent, which we may request during checkout in the future)
- **Important Notices:** Changes to policies, product recalls, safety information
- **Reviews & Testimonials:** We may request feedback on your purchase and ask for your consent to use your review publicly

3.4 Business Operations

- **Website Improvement:** Analysing usage patterns to enhance user experience
- **Security:** Fraud prevention, account protection, website security
- **Legal Compliance:** Meeting regulatory requirements, responding to legal requests

Usage Limitations: We only use your information for the purposes we've told you about, purposes you agree to, or as required by law.

4. How We Share Your Information

4.1 Service Providers

We share information with trusted third parties who help us operate our business:

- **Website Platform (Wix):** Our website is hosted on Wix.com, which may collect and process data according to their own privacy policy
- **CEM Australia:** Our supplier who receives your order details (name, address, phone, email, products ordered) to fulfill and ship orders directly to you
- **Payment Processors:** For secure payment processing (Stripe, PayPal, etc.)
- **NZ Post:** For delivery services (name, address, phone only)
- **Google Analytics:** For website traffic analysis and performance monitoring
- **Email Service Providers:** For sending order confirmations and future marketing emails (with consent)
- **Customer Support Tools:** For managing customer inquiries

Service Provider Standards: We select service providers with appropriate privacy and security practices that provide comparable safeguards to New Zealand privacy law.

4.2 Legal Requirements

We may disclose information when required by law or to:

- Comply with legal obligations or court orders
- Protect our rights, property, or safety
- Prevent fraud or illegal activities
- Respond to government requests

Notice: We will take reasonable steps to notify you of such disclosures unless prohibited by law.

4.3 Business Transfers

If our business is sold or merged, your information may be transferred to the new owner with appropriate protections maintained.

4.4 What We Share and Don't Share

What We DO Share:

- **CEM Australia (Our Supplier):** We share your name, email, phone number, shipping address, and order details so they can fulfill and ship your order directly to you
- **Service Providers:** Limited information needed for them to provide their services (as detailed above)

What We DON'T Share:

- We never sell your personal information to third parties for profit
- We don't share your information for others' marketing purposes without your consent
- We don't share sensitive payment information (our payment processors handle this securely and delete it immediately after processing)
- We only disclose the minimum information necessary for each specific business purpose

5. Data Security

5.1 Security Standards

We store and transmit your personal information with security measures appropriate to its sensitivity, ensuring protections at least equivalent to those required under New Zealand privacy law and consistent with OECD Guidelines standards.

5.2 Wix Platform Security

Since we use Wix, your data security relies on Wix's security systems:

Wix's Security Responsibilities:

- **Website Security:** Wix secures the servers, encrypts data, and maintains the technical infrastructure
- **Platform Protection:** Industry-standard security measures for websites built on their platform
- **System Updates:** Wix handles security updates and patches for the platform
- **Data Encryption:** Wix encrypts data transmission between your browser and their servers

5.3 Our Additional Security Measures

Our Security Practices:

- **Limited Access:** Only CEM NZ staff who need customer information for orders and support can access it
- **Data Minimization:** We only collect information we actually need for your purchase and support

What We Can't Control:

- Wix's server security (that's their responsibility)
- Technical security measures on Wix's platform
- Data encryption methods (Wix handles this)

5.4 Payment Security - Multiple Layers

Payment Processors (Independent Security):

- We use PCI DSS compliant payment processors (like Stripe, PayPal, etc.)
- **We never see your full credit card number** - the payment processor handles this
- Payment companies encrypt and secure all card transactions

What This Means:

- Your payment info goes directly to the payment company, not through us
- We only receive confirmation that payment worked
- The payment processor handles all card security requirements

5.5 Security Breach Response

Data Breaches:

- If Wix has a security issue, they would notify affected users according to their policies
- If we discover any security problem on our end, we'll contact you immediately
- We follow New Zealand privacy laws for reporting any privacy breaches that cause or are likely to cause serious harm

Your Protection:

- Multiple layers: Wix secures the website, payment processors secure payments, we secure our business practices
- Each company has their own security responsibilities
- You're protected by multiple security policies, not just ours

6. Cookies & Tracking Technologies

6.1 What Are Cookies

Cookies are small text files stored on your device when you visit our website. They help us provide you with a better browsing experience and understand how you use our site.

6.2 Types of Cookies We Use

- **Essential Cookies:** Required for website functionality (shopping cart, checkout process)
- **Analytics Cookies:** Help us understand website performance through Google Analytics
- **Performance Cookies:** Improve website speed and user experience
- **Wix Platform Cookies:** Used by our website platform for basic functionality

6.3 Third-Party Cookies

Our website may include cookies from:

- **Google Analytics:** For website traffic analysis and performance monitoring
- **Wix Platform:** For website hosting and functionality

- **Payment Processors:** For secure payment processing (during checkout only)

6.4 Managing Cookies

- **Browser Settings:** You can control cookies through your browser settings
- **Cookie Banner:** We display a notice about our cookie use with options to learn more
- **Opt-Out Options:** You can disable non-essential cookies, though this may affect website functionality
- **Google Analytics Opt-Out:** Visit <http://tools.google.com/dlpage/gaoptout>

6.5 Cookie Retention

- **Essential cookies:** Remain until you close your browser or complete your session
- **Analytics cookies:** Typically retained for 24 months for website improvement analysis
- **Performance cookies:** Usually expire after 30 days

For more information about cookies in general, visit <https://allaboutcookies.org/>

7.1 Access & Correction

- **Access:** Request a copy of personal information we hold about you
- **Correction:** Request correction of inaccurate or incomplete information
- **Portability:** Request your data in a portable format

Access Standards: We will provide access to your information conveniently and without unreasonable delay.

7.2 Communication Preferences

- **Unsubscribe:** Opt out of marketing emails at any time
- **Preferences:** Update your communication preferences in your account
- **Contact Method:** Choose how we contact you (email, phone, mail)

7.3 Data Deletion

- **Account Deletion:** Request deletion of your account and associated data
- **Retention Limits:** We keep data only as long as necessary for business and legal purposes

8. Data Retention

8.1 Retention Periods

- **Customer Information:** Retained while you remain a customer, plus 7 years for tax and legal compliance
- **Order History:** Retained for 7 years for warranty and legal compliance
- **Payment Information:** Immediately deleted after transaction completion (handled by our payment processors)

- **Marketing Data:** Retained until you unsubscribe or request deletion
- **Website Analytics:** Anonymized data retained for business analysis
- **Communication Records:** Email correspondence retained for 7 years for business and legal purposes

8.2 Automatic Deletion

- Marketing data automatically removed upon unsubscribe request
- Payment information immediately deleted after transaction completion

Legal Requirements: Data may be retained longer if required by law or court order, with appropriate notice provided where legally allowed.

9. International Data Transfers

9.1 Legal Framework for International Transfers

Under New Zealand's Privacy Act 2020, we can only transfer your personal information outside New Zealand if we have reasonable grounds to believe the recipient provides comparable privacy safeguards to New Zealand law, consistent with OECD Guidelines standards.

9.2 International Data Transfers We Make

Australia (CEM Australia - Our Supplier):

- **What data:** Your name, shipping address, phone number, email, and products ordered
- **Purpose:** Order fulfillment and direct shipping to you
- **Legal basis:** Australia's Privacy Act 1988 provides comparable safeguards to New Zealand law
- **Protection:** CEM Australia operates under Australia's privacy legislation, which provides similar protections to New Zealand

United States (Wix Platform):

- **What data:** Website usage data, customer information entered on our site
- **Purpose:** Website hosting and platform services
- **Legal basis:** Wix provides comparable privacy safeguards through international frameworks
- **Protection:** Wix implements industry-standard security measures and privacy protections

Google Services (Analytics):

- **What data:** Website usage analytics, anonymized user behavior data
- **Purpose:** Website performance analysis and improvement
- **Legal basis:** Google's privacy framework provides comparable safeguards
- **Protection:** Data processed under Google's privacy policies and security standards

9.3 What This Means for You

- **Multiple jurisdictions:** Your data may be processed in Australia (order fulfillment), United States (website hosting), and other countries where our service providers operate
- **Comparable protection:** All recipients operate under privacy laws that provide adequate protection similar to New Zealand standards
- **Legal responsibility:** We remain responsible for ensuring your data receives appropriate protection regardless of where it's processed
- **Transparency:** We inform you of all international transfers and their purposes

9.4 Your Transfer Options

- **Accept international processing:** Use our website and place orders normally (most customers)
- **Object to international processing:** Unfortunately, we cannot provide our services without these international transfers (Wix for website, CEM Australia for fulfillment)
- **Questions about data protection:** Contact us to discuss specific concerns about international transfers

Learn More:

- For Wix data practices: <https://www.wix.com/about/privacy>
- For Google data practices: <https://policies.google.com/privacy>
- For Australian privacy law: <https://www.oaic.gov.au/>

10. Third-Party Services & Wix Platform

10.1 Wix Privacy Policy

Our website is built using Wix.com's platform. Wix has its own privacy practices that apply to your use of our website:

- **Wix Cookies:** Wix uses cookies for platform functionality and analytics
- **Wix Analytics:** Wix collects website usage data for platform optimization
- **Wix Security:** Wix implements security measures to protect website data
- **Wix Data Processing:** Review Wix's Privacy Policy at <https://www.wix.com/about/privacy> for details

10.2 Your Wix Rights

- You can manage certain Wix cookies through browser settings
- Contact Wix directly for questions about their data practices
- Our privacy practices are separate from and in addition to Wix's policies

11. Privacy Officer

As required under Section 201 of the Privacy Act 2020, we have appointed a privacy officer responsible for ensuring compliance with privacy requirements.

Contact our Privacy Officer:

- **Email:** info@costeffective.co.nz
- **Phone:** +64 27 605 2908

12. Children's Privacy

- Our products and services are intended for adults 18+
- We do not knowingly collect information from children under 13
- If we discover we have collected child information, we will promptly delete it

13. Legal Enforcement

13.1 Legal Obligations

Our privacy commitments in this policy are intended to create enforceable legal obligations under relevant laws including:

- **New Zealand Privacy Act 2020:** Our primary legal framework
- **OECD Guidelines:** International standards we follow for comparable protection
- **Fair trading and consumer protection laws:** Additional legal protections

13.2 Enforcement Jurisdiction

Privacy enforcement should be sought in jurisdictions relevant to our business relationship, particularly:

- **New Zealand:** Where CEM NZ operates and our primary legal obligations apply
- **Your jurisdiction:** Where you live or performed relevant acts
- **International jurisdictions:** Where data processing occurs (through Wix, CEM Australia, Google)

13.3 Regulatory Resources

New Zealand:

- **Privacy Commissioner:** www.privacy.org.nz (primary regulator)
- **Complaints process:** First contact us, then Privacy Commissioner if unsatisfied

International Standards:

- **OECD Privacy Guidelines:** International framework we follow
- **International privacy authorities:** For cross-border data processing concerns

14. Changes to This Policy

- We may update this Privacy Policy from time to time
- Changes will be posted on our website with the effective date
- Material changes will be communicated via email or website notice
- Continued use constitutes acceptance of updated policy

15. Contact Us

15.1 Privacy Inquiries

For questions about this Privacy Policy or your personal information:

Email: info@costeffective.co.nz

Phone: +64 27 605 2908

15.2 Complaints Process

If you believe we have breached your privacy:

1. Contact us first to resolve the issue
2. If unsatisfied, you may complain to the Privacy Commissioner: www.privacy.org.nz

16. Definitions

- **Personal Information:** Information about an identifiable individual
- **Sensitive Information:** Information requiring special protection (we collect minimal sensitive data)
- **Cookies:** Small files stored on your device to remember preferences and usage
- **OECD Guidelines:** Organisation for Economic Co-operation and Development Guidelines on the Protection of Privacy and Transborder Flows of Personal Data
- **Comparable Safeguards:** Privacy protections equivalent to those required under New Zealand's Privacy Act 2020
- **Agent:** Under New Zealand law, a third party (like Wix or CEM Australia) that processes personal information on our behalf
- **Dropshipping:** Order fulfillment where CEM Australia ships products directly to you on our behalf

Future Services: We may implement Google Ads and Google Search Console in the future. If we do, we will update this policy and obtain any required consents.

Last Updated: June 9th, 2025

Version: 2.0

Legal Framework: Privacy Act 2020 (New Zealand), OECD Guidelines