

PICÓ PRIVACY POLICY

Effective Date: 8 August 2026

Pico Holdings Limited, trading as Picó ("Picó", "we", "us"), is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and protect personal information in connection with Picó B2B (the "Platform"), and applies to individuals who create an account, use the Platform on behalf of a business, or otherwise interact with us.

We handle personal information in accordance with the Privacy Act 2020 (NZ) and the Information Privacy Principles (IPPs) it contains. A copy of the IPPs is available from the Office of the Privacy Commissioner at www.privacy.org.nz.

If you disagree with any part of this Privacy Policy, including our use of analytics tools, you should discontinue use of the Platform.

1. Information We Collect

When you create an account, we collect your work email address. You may optionally provide your first name, last name, phone number, and business details, which you can update or remove at any time from your account settings.

Where you use the Platform on behalf of a business, we also collect business data you provide or generate through the Platform (such as pricing, stock, and promotional information). This business data is not "personal information" under the Privacy Act 2020 unless it identifies an individual, and is instead governed by the terms of your agreement with Picó.

We do not seek to collect sensitive information (as defined in the Privacy Act 2020, including health, racial or ethnic origin, or political or religious belief information) and ask that you do not provide it to us.

2. How We Use Your Information

We use personal information to provide and improve the Platform, communicate with you about your account, provide information to the business you represent, and, where you have not opted out, for marketing. You may unsubscribe from marketing communications at any time by contacting us in writing.

Where reasonably practicable, we collect personal information directly from you. If we receive it from a third party (for example, a colleague setting up your account), we will take reasonable steps to make sure you are aware of this.

3. Analytics and Cookies

We use third-party analytics tools, which may include Google Analytics and Mixpanel, to collect information about how users interact with the Platform. This helps us understand usage and improve performance. This tracking may occur even if you have "Do Not Track" enabled in your browser or device settings.

4. Disclosure of Information

We do not sell personal information. We may disclose it: to service providers who help us operate the Platform (including analytics and hosting providers); where you consent; or where required or authorised by law.

5. Overseas Disclosure

Some of our service providers, including analytics providers, may store or process information outside New Zealand. Before disclosing personal information to an overseas person, we take reasonable steps to ensure it will be subject to privacy safeguards comparable to the Privacy Act 2020, as required by Information Privacy Principle 12, or that another exception under the Act applies.

6. Data Security

We take reasonable technical and organisational steps to protect personal information from misuse, loss, and unauthorised access, modification, or disclosure. No method of storage or transmission over the internet is completely secure, and we cannot guarantee absolute security.

7. Data Retention

We retain personal information only for as long as needed for the purposes it was collected, including to meet legal, accounting, or reporting requirements. When it is no longer needed, we take reasonable steps to destroy or de-identify it.

8. Access and Correction

You may ask to access or correct the personal information we hold about you by contacting us in writing. We will not charge for a request but may charge a reasonable administrative fee for providing copies. We may ask you to verify your identity before releasing information.

9. Notifiable Privacy Breaches

If a privacy breach occurs that has caused, or is likely to cause, serious harm, we will notify the Office of the Privacy Commissioner and affected individuals in accordance with the Privacy Act 2020.

10. Changes to This Policy

We may update this Privacy Policy from time to time. Updates take effect immediately upon posting to our website, and we encourage you to review this page periodically.

11. Complaints and Contact

If you have a question or complaint about this Privacy Policy or our handling of your personal information, contact us at legal@pico.kiwi . If you are not satisfied with our response, you may complain to the Office of the Privacy Commissioner at www.privacy.org.nz.

Pico Holdings Limited (trading as Picó), NZBN 9429053585240