

Tumu Privacy Notice

Effective date: 27 June 2025

This privacy notice sets out how the following Tumu wholly or partly owned companies collect, use, hold and share your personal information collected through use of our website and digital platforms (the “Platforms”), when you meet us at an industry event, and in any other interactions we have with you. The Tumu group of companies include:

- Tumu Merchants Ltd,
- Tumu Property Ltd,
- Tumu Timbers Ltd,
- Tumu Transport Ltd,
- Killarney Capital Ltd,
- Midland Brick and Stone Ltd,
- Peakviews Village Ltd,
- TimberSpan Ltd,
- Greytown Orchards Ltd,

By providing us with your personal information, you acknowledge that our collection, use, disclosure and processing of your personal information will be in accordance with this Notice. If you do not accept this Privacy Notice, please DO NOT provide any personal information to us.

We may also collect, use, process, retain and disclose information to the extent permissible under applicable laws or if applicable law does not prohibit it. This Notice supplements but does not supersede or replace any consents you may have provided to us, or any other agreements or arrangements that you may have with us, in respect of your personal information.

Freedom to Consent and Provide Information

We will obtain your consent prior to or when collecting, using, processing, retaining or disclosing your personal data for any purpose not described in this Privacy Notice, or for a purpose that was not identified to you nor reasonably expected at the time of collection, unless we are required or permitted by applicable law not to obtain your consent.

You may provide information to be published or displayed (“posted”) on public areas of the Platforms or transmitted to other users of the Platforms or third parties (collectively “User Contributions”).

However, should you have decided not to provide your personal information to us or withdraw your consent, we may not be able to provide you with access to the Platforms or certain parts of the Platforms, or you may not be able to fully utilise all our products and services or be able to transact with us via these Platforms. The withdrawal of your consent shall not affect the lawfulness of the processing of your personal data based on consent before such withdrawal.

Furthermore, when using any discussion forum feature on the Platforms, you should be aware that any personally identifiable information posted by you may be viewed and used by other Platforms’ users. Your User Contributions are posted on and transmitted to others at your own risk. We cannot control the actions of those with whom you may choose to share your User Contributions. If you post User Contributions which include other people (particularly children/students), you must ensure that you have brought this Privacy Notice to his or her attention and obtained their consent to such User Contributions being posted on the Platforms in accordance with this Privacy Notice. Our moderators may delete User Contributions from our Platforms at our discretion.

What Information do we Collect?

Information we collect may include personal information about you. The personal information we collect may include your name, address, email address, organisation name, telephone number, location and information on your use of our Platforms and emails between us.

Retirement Village Occupation Licence Applications (where relevant)

We may also collect financial, health and legal information, and your activities including lifestyle and other interests as it pertains to Occupation Licence applications. You can always choose not to provide this information to the business, but it may mean we are unable to provide our services to you.

Our retirement villages may also collect information from you about someone else. If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that personal information to us and that, without us taking any further steps required by applicable data protection and privacy laws, we may collect, use, store and disclose such personal information for the purposes described in this Privacy Policy.

This means you must take reasonable steps to ensure the individual concerned is aware of and consents to the various matters detailed in this Privacy Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to access that information, our identity and how to contact us.

Where requested to do so by us, you must also assist us with any requests by the individual to access or update the personal information you have collected from them and provided to us.

Collection of Information

Information may be collected by us in the following ways:

- a) as provided by you through registering an account on the Platforms or through other means such as submitting an online form, request for information, survey or application or other information through the Platforms or otherwise.
- b) through completing an Application for a Retirement Village Occupation Licence
- c) as provided by you through any other method (including, without limitation, meetings, correspondence and discussions).
- d) as posted by you by way of User Contributions.
- e) through the interactions and transactions, you carry out on, or through, the Platforms or with us through other means, or
- f) through tracking your use of the Platforms, including the content you access and any services you utilise, and information collected through automated technology as further detailed in the following sub-sections of this notice.

Automatic Data Collection Technologies

As you navigate through and interact with the Platforms, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. Some of this information may be linked to you personally. This information helps our Platforms function correctly, helps us understand the needs of our users and may be used for the other purposes set out in this privacy notice.

Examples of this information include:

- a) website related traffic data, location data, logs and other communication data.
- b) data related to your use of the Platforms. This includes the pages you visit, the resources and services that you access; the time you spend on each page, the date and time of your visit,

referring pages (pages you came from or go to) and statistical and other aggregated data derived from your use of the Platforms.

- c) information about your device, computer and network connection, including your IP address, operating system, hardware version and browser type, and
- d) if you allow our Platforms to deliver content based on your location (for example by enabling this feature on your mobile device) we may collect location data (such as through GPS, Bluetooth, or WiFi signals) including for the automated delivery of relevant content and advertising to you.

The technologies we use for this automatic data collection may include log files, usage monitoring software and cookies. We use cookies to understand how an individual engages with our website and services so we can improve our services, increase engagement, and provide you with more targeted information. If you disable cookies, it may limit your access to some of the Platforms' content and features. You can choose to refuse cookies by turning them off in your browser and/or deleting them from your hard drive. You do not need to have cookies turned on to use our Platforms, but your experience and the functionality will be affected if they are not turned on.

Other Tracking Technologies

We may advertise in several ways, including online through managed social media presences, and on other unaffiliated sites and mobile applications. We may use third-party sites and social networking services such as Google, Twitter, LinkedIn, Instagram, Pinterest, Facebook and YouTube to help communicate our messages.

To understand how our advertising campaigns are performing, and to better understand the visitors to our Platforms, we may collect certain information via our Platforms through our advertising service providers. We or our vendors use several common online tracking tools to collect information about our users, such as browser cookies, web beacons, and other similar technologies. The information we collect includes IP addresses, the number of page visits, pages viewed via our Platforms, search engine referrals, browsing activities over time and across other websites following your visit to one of our Platforms or applications, and responses to advertisements and promotions on the websites and applications where we advertise.

When you communicate with us using a third-party site, that site may also collect your personal information for its own purposes. Third-party sites have their own privacy policies which are independent of ours.

Social Media and APIs

Our application programming interfaces ("API") may include social media features such as the Facebook like button, widgets associated with Twitter, the share button or interactive programs that run on our site. These features may collect your IP address, which pages you visit on our site, and how long for. If you're a member of a social media site, the interfaces may allow the social media site to connect your visits to this site with other personal information. Social media features and widgets are either hosted by a third party or hosted directly on our Platforms. Your interactions with these features are governed by the privacy notice of the third party providing it and to the maximum extent permitted by law we accept no responsibility for the actions of those third parties.

We may provide an API to enable third party applications to interface with our Platforms. For example, you may be allowed to register or access your account on our Platforms using an API with a third-party social media platform.

To enable you to interact with us through the API, the API may direct you through a process where your log-in details may be required to allow the API to connect to your account on our Platforms. When allowing such API to connect to your account on our Platforms, by setting up your account on our Platforms using an API with a third-party social media platform or providing your log-in details to such API, you should be aware that such API may be able to access your log-in details, your account details as well as other information accessible by your account when you are logged into our Platforms. Such access of

information is granted at your own risk, and you should only allow applications you trust to access your account on our Platforms.

If you set up your account on our Platforms using an API with a third-party social media platform, you also consent to us obtaining and using your information from such platform.

Accuracy and Completeness of Personal Data

You are responsible for ensuring that all personal data that you provide is true, accurate and complete, and to inform us of any changes to your personal data.

Third Parties, Advertising and Third-Party Links

We may allow third-party companies to place ads and collect information when you visit our Platforms. This may include information that will not identify you personally (such as click stream information, browser type, time and date, subject of advertisements clicked or scrolled over) and other information such as precise geo location and user device identification. This information is collected to provide advertisements about goods and services likely to be of greater interest to you. The Platforms may also contain links to a variety of advertising and third-party platforms and website sources. Some of these links may request or record information from users, use cookies or other methods to collect information from you. We have no control over the content or privacy notice practices of such sites. We encourage you to review the privacy policies of such sites before engaging in any activity with them.

Use of Information

Unless otherwise consented by you in advance, or as may be permitted or required by applicable law, we will only use and disclose your personal information to fulfil the purposes for which it was collected (and in accordance with this Privacy Notice).

You agree that your personal information may be used by us (and our employees, officers, agents, contractors, and affiliates) for the following purposes:

- a) to provide you with the goods, services, payments processing and/or information you have requested.
- b) verification of your identity for use of the Platforms and for otherwise transacting with us, and to assist you if you forget your account details, username or password for the Platforms.
- c) to assist in providing better services to you by tailoring them to meet your needs.
- d) to provide you with further information about us or other platforms or goods or services offered by us or our related companies or third parties or which we consider may be of interest to you.
- e) to carry out marketing, promotions and for publicity purposes including, but not limited to, direct marketing, research and surveys.
- f) to keep the Platforms relevant and of interest to users.
- g) to customise your preferences and to show you advertising and information that is most relevant to you and your interests based on the information you have provided to us, or we have otherwise collected.
- h) to contact you regarding purchases or orders you have made or other potential purchases we think you may be interested in.
- i) to assist us in performing our functions and activities.
- j) to perform analysis in aggregate form (identifiable characteristics removed so that you will remain anonymous).
- k) to communicate with you.
- l) to achieve any of our legitimate business purposes; and
- m) to comply with our legal obligations.

Under certain jurisdictional laws, we must have a lawful basis to process your personal information. In most cases the lawful basis will be either:

- a) to meet our legitimate interests, for example to provide you with goods and services and to understand how you use our website and to enable us to derive knowledge that enables us to develop it. When we process personal information to meet our legitimate interests, we will put in place robust safeguards aimed to protect your privacy and aimed to ensure that our legitimate interests are balanced against your fundamental rights and freedoms; or
- b) having obtained your consent to collect and use certain types of personal information (for example, in relation to any direct marketing activities), if we subsequently ask for your consent to process your personal information and we do not have another lawful basis to process your personal information, you may effectively withdraw your consent at any time by contacting us using the details at the end of this privacy notice or using any other specific mechanism we notify you of.

Information Sharing and Disclosure

You agree that we may disclose your personal information:

- a) within the Tumu group of companies for the purposes set out in the prior section.
- b) to third parties in accordance with the uses set out in the prior section.
- c) if you have requested or authorised us to do so.
- d) to our contractors, suppliers and other third parties to enable them to provide services and products to us and you, including in relation to the Platforms (e.g. freight companies, suppliers and contractors).
- e) to your organisation, colleagues and representatives for applicable purposes set out in the prior section.
- f) by sharing aggregated demographic information (in a form in which you will not be identified) about our user base with our partners.
- g) when we believe it is appropriate to comply with applicable law, facilitate court proceedings or to protect our rights.
- h) where we are authorised or required to do so by applicable law.

How do we Protect Your Information

We are concerned about ensuring the security of your personal information, and we have taken appropriate and practicable measures to ensure its security and confidentiality. We exercise great care in providing secure transmission of your data from your browser or device to our servers. We store personal data that we have collected in secure operating environments. We will only retain your personal data for the period reasonably required to fulfil the purposes for which it was collected. We may retain non-personal data for as long as we have a business need to do so.

All our service providers and contractors are contractually obligated to employ appropriate data security measures with respect to your personal data and to collect, use, process, retain and disclose it only within the scope required. The contractors we contract with will use your personal data if required to perform their respective services. These include the use of technologies detailed in this Privacy Notice.

We try our best to safeguard personal data once we receive it, but please understand that no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. If you suspect an unauthorized use or security breach of your data, please contact us as soon as possible.

Data Transfer

We may transfer your personal data to different jurisdictions in connection with the purposes described in the Information Sharing and Disclosure Section above: (a) from the jurisdiction where it is collected (or where you are located) to any other jurisdictions that we operate in; and (b) to third parties in other jurisdictions. Where we transfer your personal data across jurisdictions, we will ensure that your personal

data is protected in accordance with this Privacy Notice and applicable laws regardless of the jurisdictions they are transferred to. To the extent you are in Australia for example, where information is to be held outside of Australia, we take reasonable steps aimed to ensure the overseas recipient complies with the principles contained in the Australian Privacy Act.

Your Rights

Under applicable privacy legislation, you have or may have rights of access to and correction of personal information that we hold. This can be done by contacting us by email at privacy@tumu.co.nz or mail to Level 1, 24 Porter Drive, Havelock North, Hastings, New Zealand, 4130 or as set out in the Contact Details section below.

Competitions

We will collect personal information provided by you if you participate in our promotions and competitions. We collect this information to conduct the promotion or competition. We may disclose such information to third parties, such as agents, contractors, service providers and prize suppliers to conduct the promotion or competition. You agree that we may also use and disclose this information as set out in this privacy notice. Entry is conditional on providing this information. If the information is not fully supplied the entry may be void.

If you provide us with the names and contact details of any other people that you would like to have participate in our contests or promotions, we will also collect this information. You warrant that you have their permission to provide us with this information and for us to use it for this purpose.

Marketing to You and Commercial Electronic Messages

If you provide us with electronic contact details, you agree that we may send you commercial electronic messages (e.g. texts and emails) for any of the purposes set out in this privacy notice. You can opt out at any time, and we will unsubscribe you. In order for us to market products, events and services which are of specific interest and relevance to you (including those belonging to another entity within the Tumu group of companies), we may analyse and rely on your personal data provided to us, or data collected from your interactions with us. However, no marketing using your personal data would be carried out unless you have provided us with your consent to use your personal data for such marketing purposes. If you do not want us to use your personal data for the purposes of marketing, you can withdraw your consent at any time by opting out in the marketing email itself or contacting us using the details below.

Changes in the Privacy Notice

We reserve the right to make changes to our privacy notice or alter our Platforms' functionality. Any changes made will be updated in this privacy notice accordingly, so we encourage you to review this notice for the latest information on our privacy practices. The effective date of this privacy notice is as set out at the beginning of this privacy notice (Effective Date). When we make a change, it becomes effective on the date that we inform you of the change or, earlier, the date that is the latest of (i) the Effective Date; and (ii) the date on which it is first uploaded to our website. If you do not agree to the changes to the privacy notice, please discontinue use of our Platforms. Your continued access or use of the Platforms following such changes indicates your acceptance of the privacy notice as amended. If at any time we decide to use personally identifiable information in a manner different to that stated at the time it was collected, we will notify you by way of email. You will have a choice as to whether we use your information in this different manner. We will use information in accordance with the privacy notice under which it was collected.

Contact Details

If you have any questions about our privacy notice, or any other matter, or you wish to withdraw your consent to this Privacy Notice to the extent applicable laws provide you this right, please feel free to contact us. You can reach us in one of the following ways:

Email Tumu: privacy@tumu.co.nz

Phone: 06 872 6200

Mailing Address: Privacy Officer, PO Box 2308, Hastings, New Zealand 4156

Complaints

If you wish to make a complaint about our handling of your personal information, you should first contact us directly using our contact details above. We will respond to you in accordance with applicable laws. If you are not satisfied with our response, you may be able to complain to a regulator in your jurisdiction.