

# PRIMER-e

## PRIVACY POLICY

### INTRODUCTION

PRIMER-e (Quest Research Limited) (**we, us, our**) complies with the New Zealand Privacy Act 2020, and the General Data Protection Regulation of the European Union (**GDPR**) and the equivalent laws of the United Kingdom (**UK GDPR**) when dealing with personal information.

Personal information is information about an identifiable individual (a natural person), and includes personal data, personally identifiable information and equivalent information under applicable privacy and data protection laws.

This policy does not limit or exclude any of your rights under the New Zealand Privacy Act 2020 or the GDPR or UK GDPR.

This policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. We are happy to provide any additional information or explanation needed. Any request for further information should be sent to [primer@primer-e.com](mailto:primer@primer-e.com).

### CHANGES TO THIS POLICY

We may change this policy by uploading a revised policy onto our website. The change will apply from the date that we upload the revised policy.

**This policy was last updated on 9 January 2026.**

### WHEN DOES THIS PRIVACY POLICY APPLY

This policy sets out how we will collect, use, disclose and protect your personal information when you visit and use our website and related services, purchase products or services from us, download, install and activate our software, or otherwise deal with us.

### CHILDREN

We do not intend to collect personal information from or about children aged under 16. If you have reason to believe that we have collected personal information from or about a child under the age of 16, please contact us at [primer@primer-e.com](mailto:primer@primer-e.com).

## WHAT PERSONAL INFORMATION DO WE COLLECT

### ***Directly from you***

We collect the following information directly from you.

When you fill in a form on our website to ***make an enquiry***, to ***subscribe to our emails***, to ***download our software***, or to ***request a consultation***, we collect your first and last name, email address, name of organisation, country and any other information you choose to provide to us (e.g., information relating to your query). We may also collect this information directly from you if you call us, meet with us in person, send us an email or otherwise contact us.

When you fill in a form on our website to ***request a quote***, in addition to the above information, we also collect your street address/address for billing.

When you fill in a form on our website to ***register for a course or workshop***, we collect your first and last name, email address, name of organisation, address, country, name and address for billing, and any additional information you may want on your invoice. If you are attending a course or workshop in person where food is provided, we will also collect, *via* the form, the following categories of personal information: your dietary requirements, the name, email and phone number of a person who we should contact for you in the event of an emergency, and any other relevant personal information that may be required by the venue/workshop host. We recognise that information about your dietary requirements may be sensitive personal information (***Sensitive Information***) and we will treat it as such.

When you fill in a form on our website to ***apply for a student discount***, we collect your first and last name, email address, academic organisation where you are enrolled to study, country, degree program, thesis title, a link to your student profile online (if available), an upload of your current student photo ID, and your academic supervisor's first name, last name and email address.

When you fill in a form on our website to ***apply for an educational licence discount***, we collect your course details (name, academic organisation, country and course outline/syllabus, instructor's first name, last name, and email), and the licence administrator's first name, last name, and email address.

When you respond to our ***feedback surveys*** administered *via* email and/or *via* a website link from us, we collect your responses to all the specific questions posed in the survey. All survey responses are anonymised.

When you ***purchase products or services from us***, including subscriptions to software products, we collect your first name, last name, email address, organisation, country and any other information you submit to us for billing and order fulfilment purposes.

When you ***purchase a subscription to one of our software products***, you are also invited to access our ***customer portal***, where you can see invoices, payments and receipts, change your details and manage, change or cancel your subscription. For this, we will collect your first name, last

name, email address and a password. Your password to the customer portal is stored directly by our third-party provider (Zoho) and is not accessible to us, but remains private to you.

If you pay us via direct electronic bank transfer, and we need to **pay you a refund**, we may collect your bank account details for the purpose of providing that refund. Refunds of payments made via debit/credit card are processed by our third party debit/credit card payment processor (for further details, see the *Third Party Service Providers* section below), without us needing to have any access to your card details.

Some of the personal information that we collect directly from you may be mandatory and some may be optional. We will let you know which of these applies at the time we collect the relevant personal information. While you do not have to provide us with some of the information that we may request, this might mean that we may not be able to provide all of our products or services to you. If you require further information about the consequences of not providing us with any information, please contact us at [primer@primer-e.com](mailto:primer@primer-e.com).

We use third party service providers to process all debit/credit card transactions. We do not have access to your credit card information. For further details, see the *Third Party Service Providers* section below.

#### ***Automatically, when you authenticate your licence within our software***

To provide software licensing, activation, and ongoing validation, we collect and store limited technical and identification information associated with each licensed device. We use third party software licensing tools (Keygen) to provide you with your software licence. When you download, install and activate PRIMER software, our licensing system automatically collects information about your device. This information may include:

- Device identifiers such as computer name
- Network information such as IP address (where applicable)
- User-identifying information such as a user name (where applicable)
- Product and licence details, including product edition and entitlements
- Licence status information (for example, whether a licence is active or inactive)
- Licensing and usage metadata, such as activation dates, last authentication dates, and heartbeat or offline validation timestamps

This information is used solely for:

- Managing software licensing and entitlements
- Preventing unauthorised use
- Supporting floating and offline licensing
- Troubleshooting licensing-related issues
- Product usage auditing and compliance

For PRIMER 7, licensing data may additionally include:

- The device's IP address

- Authentication history associated with the licensed device

For PRIMER 8, licensing data may additionally include:

- The user name associated with the licensed device
- Floating licence heartbeat timestamps
- Offline licence checkout timestamps

We do not use this information for marketing purposes, and we do not sell licensing data to third parties.

### ***From third party sources***

Where possible, we collect personal information from you directly. However, sometimes we may collect personal information that is publicly available (e.g. through LinkedIn profiles, public directories, databases, registries or organisation websites).

We may combine the personal information about you that we receive from third parties with the personal information we collect from you directly or with device and usage data we collect automatically when you download, install and activate our software (see the section above entitled '*Automatically, when you authenticate your licence within our software*').

## **END-USER DATA IN PRIMER SOFTWARE REMAINS ON THE END-USER'S MACHINE**

PRIMER software is a locally installed Windows desktop application, and not a cloud-based product. All analytical processing and end-user data remain on the end-user's machine. No end-user data that is created, imported, or analysed by PRIMER software is transmitted to our infrastructure, third-party providers or external vendors. We cannot view, access or store any end-user data or results being analysed or examined within the PRIMER software environment. The only information handled by our third-party providers is operational metadata required to provide our licensing services (such as authentication infrastructure), not customer or institutional data.

## **HOW WE USE YOUR PERSONAL INFORMATION**

We may use your personal information to:

- verify your identity as a student or an instructor for education purposes
- provide our products and services to you
- market our products and services to you, including contacting you electronically (e.g. by email for this purpose)

- improve our website, products and services
- publish things on our website (e.g. comments or testimonials)
- run promotions (e.g. referral and loyalty programmes, surveys and contests)
- bill you and collect money that you owe us, including authorising and processing credit card transactions
- respond to communications from you, including enquiries and complaints
- conduct research and statistical analysis
- tailor content or advertisements on our website to you
- protect and/or enforce our legal rights and interests, including defending any claim
- respond to lawful requests by public authorities, including to comply with law enforcement requirements, or
- for any other purpose authorised by you or applicable law.

We may transfer your information in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition.

We may use Sensitive Information to protect your safety and well-being at one of our courses or workshops if you are attending in person.

You can stop receiving our marketing emails by following the unsubscribe instructions included in those emails or contacting us directly at [primer@primer-e.com](mailto:primer@primer-e.com)

## **DISCLOSING YOUR PERSONAL INFORMATION**

We may disclose your personal information to:

- any business that supports our website, products and services, including any person that hosts or maintains any underlying IT system or data centre that we use to provide our website, products or services or that we use to process payments
- third parties (for anonymised statistical information)
- professional advisers e.g. accountants, lawyers or auditors
- a person who can require us to supply your personal information (e.g. a law enforcement agency or regulatory authority)
- any other person with your consent

- any other company in the case of a sale, merger, consolidation, liquidation, reorganisation or acquisition
- any other person authorised by applicable law.

### THIRD PARTY SERVICE PROVIDERS

We process your personal information using third-party service providers for the purposes set out below.

The third-party service providers we use are:

- **Stripe:** We use Stripe to process all debit/credit card transactions and to handle compliance with sanctions regimes. We do not have access to your credit card information. You can see Stripe's privacy policy here: <https://stripe.com/nz/privacy>. For the purposes of Stripe's privacy policy, you are an *End Customer*.
- **Keygen:** We use Keygen to produce licence keys, and to provide those licence keys to you. The information we process using Keygen is described in the *What Personal Information Do We Collect* section above. Keygen processes your personal information solely as a service provider (or "data processor") on our behalf.
- **Zoho:** We use Zoho for our CRM, including generating quotes, invoices, billing, subscriptions and analytics. Zoho houses our core customer database and manages our hosted payment pages for subscription payments. Zoho processes your personal information solely as a service provider (or "data processor") on our behalf.
- **Xero:** We use Xero for business accounting purposes. Xero processes your personal information solely as a service provider (or "data processor") on our behalf.

We use 2-factor authentication with all of our third-party service providers, and we use a secure third party password security service.

### INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

A business that supports our website, products and services may be located outside of New Zealand (the country where we are incorporated) and also outside of the country where you are located. This means that the personal information we collect may be transferred to, and stored in, a country outside of New Zealand and the country where you are located.

If you are in the European Union (**EU**), your personal information may be transferred outside of the European Economic Area (**EEA**). Under the GDPR, the transfer of personal information to a country outside the EEA may take place where the European Commission has decided that the country

ensures an adequate level of protection. In the absence of an adequacy decision, we may transfer personal information if other appropriate safeguards are in place.

If you are in the United Kingdom (**UK**) your personal information may be transferred outside of the UK. Under the UK GDPR, the transfer of personal information to a country outside the UK may take place where that country has been granted adequacy status for the purposes of the UK GDPR. In the absence of an adequacy decision, we may transfer personal information if other appropriate safeguards are in place.

Where we transfer personal information outside the EEA or UK, it will only be transferred to countries that have been identified as providing adequate protection for EU/UK data, or to a third party where approved transfer mechanisms are in place to protect your personal information (e.g. by entering into [Standard Contractual Clauses](#) and/or the UK's International Data Transfer Agreement or International Data Transfer Addendum to the Standard Contractual Clauses). For further information, please contact us at [primer@primer-e.com](mailto:primer@primer-e.com).

Some of the personal information we collect is processed in New Zealand. New Zealand is recognised by the European Commission and the UK government as a country that has an adequate level of data protection and we rely on this decision in transferring personal information to New Zealand.

## **PROTECTING YOUR PERSONAL INFORMATION**

As required by applicable law, we will take steps to keep your personal information safe from loss, unauthorised activity, or other misuse. We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks inherent in processing personal information.

You play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used in relation to our products and services. You should not disclose your password to third parties. Please notify us immediately if there is any unauthorised use of your account or any other breach of security.

## **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

Subject to certain grounds for refusal under applicable law, you have the right to access your personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

Where you request a correction, if we think the correction is reasonable and we are reasonably able to change your personal information, we will make the correction. In all other cases, we will take

reasonable steps to make a note of the personal information that was the subject of your correction request.

If you want to exercise either of the above rights, email us at [primer@primer-e.com](mailto:primer@primer-e.com). Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information to be corrected and the correction that you are requesting).

Subject to applicable law, we may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

## **OTHER RIGHTS**

In addition to the rights to access and correct your personal information, if you are in the EU or UK, you have the additional rights set out in the GDPR Additional Terms section of this privacy policy below.

## **INTERNET USE**

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

If you follow a link on our website to another website, the owner of that website will have its own privacy policy relating to your personal information. We suggest you review that website's privacy policy before you provide personal information to that owner or website.

## **DATA RETENTION POLICY**

The personal information that we collect and use will not be kept longer than necessary for the purposes for which it is collected, or for the duration required for compliance with applicable law, whichever is longer.

## **CONTACTING US**

If you have any question about this privacy policy, or our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us at [primer@primer-e.com](mailto:primer@primer-e.com).



## GDPR ADDITIONAL TERMS

### LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION

Our lawful basis for processing (as that term is defined in the GDPR and UK GDPR) personal information that we collect, use and disclose depends on the personal information collected and the context in which we collect it.

Generally, we collect personal information from you where we have your consent, where processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, or where processing is necessary for the purposes of our legitimate interests (except where such interests are overridden by your interests or fundamental rights and freedoms).

Where we process personal information based on your consent, you may withdraw your consent at any time.

Our lawful basis for processing Sensitive Information is to protect your health, safety and well-being when you attend (in person) a course/workshop administered by us at a given venue, and relies on your consent.

Despite the above, we may process your personal information where such processing is necessary for compliance with applicable laws.

If you have any question about the legal basis on which we process personal information or need further information, please contact us at [primer@primer-e.com](mailto:primer@primer-e.com).

### YOUR RIGHTS UNDER THE GDPR AND UK GDPR

If you are in the European Union or the United Kingdom, your rights in relation to your personal information include:

- **right of access** - if you ask us, we will confirm whether we are processing your personal information and provide you with a copy of that personal information
- **right to rectification** - if the personal information we hold about you is inaccurate or incomplete, you have the right to have it rectified or completed. We will take reasonable steps to ensure inaccurate personal information is rectified. If we have shared your personal information with any third party, we will tell them about the rectification where possible
- **right to erasure** – when your personal information is no longer needed for the purposes for which you provided it, we will delete it. You may request that we delete your personal information and we will do so if deletion does not contravene any applicable law. If we have shared your personal data with any third party, we will take reasonable steps to inform those third parties that they must delete your personal information

- **right to withdraw consent** - if the basis of our processing of your personal information is consent, you can withdraw that consent at any time
- **right to restrict processing** - you may request that we restrict or block the processing of your personal information in certain circumstances. If we have shared your personal information with any third party, we will tell them about this request where possible
- **right to object to processing** - you may request that we stop processing your personal information at any time and we will do so to the extent required by the GDPR and/or UK GDPR (as applicable)
- **rights related to automated decision-making, including profiling** - you have the right to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where such automated decision-making is necessary for entering into, or the performance of, a contract with you, is authorised by applicable laws or is based on your explicit consent. We do not undertake automated individual decision-making.
- **right to data portability** - you may obtain your personal information from us that you have consented to give us or that is necessary to perform a contract with you. We will provide this personal information in a commonly used, machine-readable and interoperable format to enable data portability to another data controller. Where technically feasible, and at your request, we will transmit your personal information directly to another data controller
- **the right to complain to a supervisory authority** - you can report any concern you have about our privacy practices to your local data protection authority.

Where personal information is processed for the purposes of direct marketing, you have the right to object to such processing, including profiling related to direct marketing.

If you would like to exercise any of your above rights, please contact us at [primer@primer-e.com](mailto:primer@primer-e.com). If you are not satisfied by the way we deal with your query, you may refer your query to your local data protection authority.

# COOKIE POLICY

## INTRODUCTION

We use cookies on our website and as part of our related services, and receive information collected through cookies. This cookie policy explains how we use cookies and how you can opt out of cookies.

We use the term *cookies* in this cookie policy to mean cookies or similar technologies such as web beacons, clear GIFs, and pixel tags.

## WHAT ARE COOKIES

Cookies are text files containing small amounts of information which are downloaded to your browsing device, e.g. a computer or smartphone, when you visit a website. Cookies can be recognised by the website that downloaded them, or by other websites that use the same cookies. This helps a website know if the browsing device has visited that or other websites before.

Cookies can be used to collect information relating to your use of a website or your device, let you navigate between pages effectively, help to remember your preferences and generally improve your browsing experience.

Cookies can be *session* or *persistent* cookies. *Session* cookies are temporary and only stay on your browser until you stop browsing. *Persistent* cookies stay on your device until they expire or are deleted.

The cookies used on our website may be first party cookies (i.e. set by us) or third party cookies (i.e. cookies set on our website by a person other than us). The third party companies that place cookies on our website will have their own privacy policies.

## WHAT TYPES OF COOKIES DO WE USE

The types of cookies used by us, and most websites, can generally be categorised as follows.

### ***Strictly necessary cookies***

These cookies are essential for the full functionality of our website and related services. They enable you to navigate around our website and services and use their features e.g. accessing secure areas and enabling services that you have asked to receive. If you opt out of these cookies, you may not be able to access all the functions of our website and some services that you have asked to receive.

These cookies do not track where else you have been on the internet and do not remember your preferences beyond your current visit. These cookies are generally first party session cookies which

will expire when you close your browsing session. These cookies do not collect information that could be used for marketing purposes.

### ***Functionality cookies***

These cookies allow a website to remember choices you make and provide enhanced, more personal features, e.g. these cookies allow us to remember the settings you have applied to the website (such as font size, preferences or colours), identify whether you are a returning website visitor and present you with a personalised version of the website, or eliminate the need for you to re-enter your login details. The information these cookies collect is generally anonymous and they do not track your browsing activity on other websites. These cookies may be first or third party, session or persistent cookies.

### ***Performance cookies***

These cookies collect information about how you use a website, e.g. which pages are the most visited and if you receive any error message from any page. This information helps us improve the way our website and related services work and helps us manage the performance and design of the website and services. These cookies do not gather information that identifies you. All of the information these cookies collect is aggregated and anonymous. These cookies may be first or third party, session or persistent cookies.

## **GOOGLE COOKIES**

We use Google Analytics to collect information about visitors to our website. Google Analytics collects information related to your device, browser, IP address, network location, and website activities to measure and report statistics about your interactions on our website. We use this information to help us manage the performance and design of our website and to improve our website.

We use Google Ads and Google Analytics Advertising Features, including Remarketing with Google Analytics, Google Display Network Impression Reporting and/or Google Analytics Demographic and Interests.

For further information on how Google uses your personal information when you use our website and how to opt out of Google's use of cookies, see [here](#) and [here](#). In addition to the process described in this link, you can opt out using the process described below.

## **HOW TO CONTROL OR OPT OUT OF COOKIES**

You can control and/or delete cookies as you wish. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. However, if you do this, you may have to manually adjust some preferences every time you visit our website and attempt to use our services, you may not be able to access certain parts of our website or services, and some functionalities may not work.

You can find out more information about how to change your browser cookie settings at [www.aboutcookies.org.uk](http://www.aboutcookies.org.uk).

To learn more about how to control cookie settings through your browser:

- click [here](#) to learn more about the *Private Browsing* setting and managing cookie settings in Firefox
- click [here](#) to learn more about *Incognito* and [here](#) to learn more about managing cookie settings in Chrome
- click [here](#) to learn more about managing cookie settings in Microsoft Edge
- click [here](#) to learn more about *Private Browsing* and [here](#) to learn more about managing cookie settings in Safari.

### **THIRD PARTY WEBSITE COOKIES**

If you follow a link on our website to another website, the owner of that website will have its own cookies. We suggest you review that website's cookie policy before you visit that website.