



Privacy Policy

Last Updated: 12 December 2025

This policy explains how we collect, use and share your personal information and how we keep it safe. We hope you find it honest, transparent, and easy to understand. In this policy, "we" means Spark New Zealand Limited and our related group of companies.

We may update this policy to reflect changes to how we manage your information. We will update this policy in advance of such changes. If the changes are significant, we will take extra steps to make you aware of them, such as communicating with you directly.

Who this policy applies to

Customers:

This policy applies to you if you're a customer of Spark. It also applies to anyone who uses our products and services under your account or anyone who interacts with us using your account.

This includes the use of Spark mobile, broadband, landline and digital platforms.

We rely on you to ensure all users under your account understand and consent to this policy.

Non-customers:

This policy applies to you, even if you're not a Spark customer, if you:

- use Spark products or services under another person's Spark account (e.g. your employer or a family member)
- are an authority on another person's Spark account
- interact with us, including in person or online
- take part in a Spark survey, enter a competition or use the promotional area at Spark Arena

Other privacy policies

Some products and services that we supply or that are associated with Spark have their own privacy policies, such as:

- Bigpipe
<http://pages.bigpipe.co.nz/bigpipe-broadband-customer-terms-and-conditions>

- Skinny
www.skinny.co.nz/privacy-policy
- UbiQuity
[Privacy Policy | UbiQuity](http://Privacy%20Policy%20%7CUbiQuity)

Where a product or service we supply to you has its own privacy policy, that privacy policy will apply to your use of that product or service. Similarly, products and services provided by our business partners may have their own privacy policies, such as Netflix and Spotify. Their policies will apply to your use of their services along with this policy.

Our promise to you

Being a digital service provider in today's world comes with special responsibilities. We are committed to being a provider you can trust.

We promise to:

- Comply with the Privacy Act 2020 and the Telecommunications Information Privacy Code 2020 (these can be found at www.legislation.govt.nz)
- Take steps to keep your personal information safe and secure.
- Never share the content of your communications (for example: calls, texts, emails) with third parties unless you have agreed we can, we legally have to (e.g. if we receive a court order) or where we reasonably believe we need to help prevent or detect fraud, or to prevent or lessen a serious threat to public health, safety or the life or health of any person.
- Treat your location information with sensitivity and give you options about collection, use and disclosure of this information where practicable.
- Provide you with some options to control how we use your personal information. View your privacy: your choices and rights (p10).

Personal information we collect

The personal information we collect depends on how you use our products and services as well as our relationship with you, as described below.

Account, Identity and Settings Information

We collect information which helps us interact with you, set up and manage your account, or supply our products and services in accordance with your preferences. This may include, for example:

- **Account information** like your contact details, photos, identification documents and account authorities, your product and service choices, payment details, billing information and other information relevant to financial and credit assessments.
- **Notification settings and communication preferences** like preferred language and app notification options.
- **Information from third-party login providers** like Facebook/Meta or Google, when used to sign in to our online services. This can include information based on your settings, such as your email address, profile photo and a login token. We don't collect your password for those service providers. You can change those settings in your Google Account privacy settings and Facebook Account privacy settings.
- **Medical information** in limited cases. For example, if you want a landline to use for emergency services only or you're seeking a Vulnerable End User status for you or a member of your household.

Location information

We collect information generated about your location. This may be generated automatically as we supply our products and services to you (e.g. when your device connects to cell towers and GPS satellites.) It may also be generated when you share your information with us through a website, app or other digital platform and may be optional. View your privacy: your choices and rights (p10).

Technical and performance information

We collect information related to our products, services, equipment or networks. For example we may collect information about how they're performing for you.

Device information

We collect information specific to your device, such as model, software and configuration versions and settings, unique device and service identifiers, and technical and performance related settings.

Interaction and usage information

We collect information about your use and interaction with us and our products and services. This may include, for example:

- **Usage information** including caller and called numbers, time and duration of communications, service plan usage, websites and other online locations visited, content viewed on Spark platforms, advertisements displayed to you and actions you take on our websites, social media pages and apps.
- **Information you share when you contact us**, including by phone or you can message us.
- **Cookies and other identifiers** such as IP addresses. We also collect information using cookies, web beacons, clear gifs, advertising IDs and similar technologies. This information is often optional (p10).
- **Audio-visual recordings** from in-store CCTV cameras.
- **Information about the internet service provider you use** to access our services.

The content of your communications (for example: calls, emails, texts)

Such content is technically collected by us as part of the process of connecting and delivering your communications. We treat this content with the greatest sensitivity and care, and only use it:

- To deliver it to your intended recipient as part of the service we provide.
- To detect and prevent attacks against our networks, systems and platforms, and threats to their security or integrity.
- For public safety.
- Where we reasonably believe we need to help prevent or detect fraud, or to prevent or lessen a serious threat to public health, safety, or the life or health of any person. .
- Where you have agreed we can.
- To comply with our legal obligations.

How we collect your personal information

We collect your information in three ways:

- **You give it to us**, for example when you set up an account with us, when you communicate using our products or services, contact our call centre, message us, or enter a competition.
- We obtain it from others, for example:
 - Loyalty program partners
 - Credit reference agencies
 - Other product and service providers
 - Information aggregators or curators
 - Social media and advertising partners
 - Customer insights providers
 - Publicly available sources like census data or real estate listings
 - We only collect data from trusted providers and only if it's lawful or they confirm they have permission to share it.
- **It is created by us or by a technological process** when you use our products or services. For example, location information generated when your mobile phone connects to a mobile phone tower or from the cookies stored on your device when you visit our websites.

We may also:

- Create new information about you by combining your information. This could include combining your information with data we have obtained from social media, advertising and customer insights providers.
- Form a view of your household from your address information and information about the location and online interactions of other people and you ("Household View").

Find out more about these initiatives and your choices: How we use your personal information (p6); How we share your personal information p7); Your privacy: your choices and rights (p10)

How we use your personal information

Within the Spark group of companies, we only use your personal information in connection with the original purpose for which it was collected, for a directly related purpose, with your authorisation (including under this policy), or for another purpose that is lawfully authorised (such as for public safety).

Some common uses we make of your personal information include:

- Providing you with rewards, discounts and other benefits.
- Contacting you.
- Managing our relationship with you.
- Providing and improving products and services and innovation.
- Managing and improving our networks and technology.
- Marketing, subject to your ability to unsubscribe and manage other preferences. View your privacy: your choices and rights (p10).
- Personalising user experiences, including on third-party platforms. We use personal information to form insights about your experience of Spark. We also build a picture of the kind of Spark experiences you and your household may be interested in, across our and others' platforms. This lets us provide you with products, services and offers that we think are most relevant to your needs.

The information we use to personalise your user experience includes Household View information, such as:

- Our view of your household is based on your address information and information about the location and online interactions of other people and you.
- Information we create about you and your household by combining information we hold with information obtained from social media, advertising and customer insights providers. See how we collect your personal information (p5).

You have some choices when it comes to these activities (p10).

- Credit reporting and credit checks, debt recovery, and checking your compliance with our terms and fair use policies.
- Protecting against illegal and fraudulent activities. This includes taking proactive measures to secure our networks.
- Complying with our legal and regulatory obligations, including court orders and other legal processes, law enforcement assistance, emergency response assistance; and, if we have reasonable grounds to believe that sharing this content is necessary to help prevent or detect fraud or to prevent or lessen a serious threat to public health, public safety, or someone's life or health (including your own).

How we share your personal information

When we share your personal information

Beyond the Spark group of companies, we only share your personal information in connection with the original purpose for which it was collected, for a directly related purpose, with your consent, or for another lawful purpose (for example, to help the Police locate a missing person).

Who we share your personal information with

We may share your personal information with people who you ask us to share it with. We may also share your personal information with trusted third parties like service providers, business partners, agents, and advisors. We require such recipients to take appropriate measures to protect the information and restrict their use of it. You have some choices when it comes to sharing information about you (p10).

Why we share your personal information

Common reasons we share your personal information with these recipients include:

- Managing the supply of products and services to you.
- Providing services to us, such as technology and business process services, market research, advertising placement, product development, business intelligence and customer insights.
- Otherwise helping us to use your personal information in accordance with this policy.
- To comply with legal obligations that we have, including when a new law is made or a law is changed.
- To help detect and prevent fraudulent or illegal use of our products or services.
- When we sell a business or asset, or to comply with other contractual obligations that we have or accept.

We may also share your personal information with other third parties for purposes described in this policy, such as to:

- Your authorised representatives - for example, account authorities or advisors.
- Other network operators, telecommunications companies and depending on your preferences, directory providers. View your privacy: your choices and rights (p10).
- Government, law enforcement and emergency response agencies.

- Credit assessment, credit reporting and debt collecting and debt servicing organisations (for example where we assign any amounts owed by you to us and we need to provide information to assignees and their agents, advisers and service providers).
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How we store, manage and protect your personal information

How long we hold your information for

We usually only hold and use your personal information for as long as it's needed in connection with its original purpose. After that, we delete it or anonymise it.

Some personal information may be held or used for longer for purposes directly connected to the original purpose or to comply with our legal and regulatory obligations. For example, we generally keep:

- Contact centre recordings for about two months, in-app chat messages for approximately one year and live chat messages for up to three years, or more to help with coaching, fraud investigation and complaint investigation.
- Billing records for seven years, even after you stop being a customer, to comply with our legal obligations, to help reconnect you and to improve our credit, fraud management controls and decision-making/credit scoring models.

In some circumstances we may need to keep some information longer when necessary for a lawful purpose. For example, to investigate and resolve an issue or to assist with law enforcement.

Where we hold and use your information

Most of your personal information is held and used online in Spark cloud platforms, or on our servers in New Zealand.

We send some of it overseas when we engage partners in overseas locations to provide data processing or storage services to us. We may also engage New Zealand-based providers who use their own overseas data processing or storage partners to deliver services to us.

These overseas providers include, for example, data centre providers, advertising partners and customer insights providers.

Our security measures

Wherever we hold or use your personal information, we apply strict security measures and follow industry standards to ensure its confidentiality and integrity.

What you can do

To help with our efforts to keep your personal information safe, we ask you to:

- Keep unique account information such as your account number, PIN and password secure. Don't share them with anyone.
- Always select strong, unique passwords or PINs. Don't re-use them from other services or platforms now or in the past, and don't re-use them on other services or platforms in the future.

We may assume that any verbal or online request or instruction we receive is authorised by you, if it's accompanied by suitable verification such as your Spark account number, personal identification number or password.

What we will do if there is a data breach

If, despite our efforts, we become aware of a data breach that we think could compromise your security, we'll tell you as soon as we can. We may also report the breach publicly, if we consider it appropriate to report or if we're required to by law.

Your privacy: your choices and rights

Your choices

You can make choices about your privacy through preference settings in our apps or on your device. Please note that limiting the information we receive can affect how we interact with you and your experiences of our products and services

Cookies and similar technologies

Cookies and similar technologies let us remember your preferences and tailor our content to your interests. They are usually enabled by default. Most web browsers and mobile device settings will allow you to disable them or set limits on how they work, manage settings for advertising preferences and manage opt-outs.

For more about how to turn advertising identifiers off:

- Apple iPhones and iPads - support.apple.com/en-us/HT202074
- Android devices - support.google.com/googleplay/android-developer/answer/6048248?hl=en

Access to photos and images

If you choose to upload a photo or image (such as a profile picture) to any Spark website, social media page or app, you may be choosing to give us access to your camera, photo library or both.

We will only store the photos or images you choose to upload. You can also remove this access through your device settings once you are done uploading.

Deleting social sign-on information

You can choose to have your social sign-on information deleted from your Spark app and MySpark online account. Contact Spark and we'll help you set up an account login that uses an email address and password, instead of social sign-on. Our number is 0800 800 123 (for consumers) and 0800 800 126 (for businesses).

Closing your Spark app and MySpark online account

You can ask us to close your Spark app and MySpark online account by contacting us on 0800 800 123 (for consumers) or 0800 800 126 (for businesses).

When this is done, you won't be able to log in, view or manage your Spark services using the Spark app or MySpark online. We'll delete your account login information (including any information enabling social sign-on) the name you go by in the app and some preference information, such as your profile photo and the names you gave any linked products.

Your Spark account and the products and services you have with us will remain unchanged. You can also open a new Spark app or MySpark online account at any time.

Location information settings

On your device, you can set permissions about location information we receive about you through settings on social media platforms, your device and via our website and apps.

Read more about how to manage location information on:

- Apple iPhones and iPads - support.apple.com/en-us/HT203033
- Google Android devices - support.google.com/accounts/answer/3467281?hl=en

Promotional communications

You can unsubscribe from marketing communications. You can also decide the ways you'd like to receive offers and promotions from us. Read more about how to manage your communications from Spark: www.spark.co.nz/help/account/manage/manage-communications-from-spark

If you've chosen to share your location with us and to receive marketing information, we may provide you with information about in-store and Spark Arena events or other special promotions near you. You can make choices about this sort of location information use through settings on social media platforms, your device and via our website or apps.

When signing up, you can opt in by ticking the box if you want to receive exclusive offers and other marketing and promotions from us and our partners.

Directory listings

With your permission - your name, address and Spark telephone number(s) are made available to directory providers such as the Yellow and White Pages.

You may choose a directory listing status and other options for your landline or mobile number that suits you, for example you may choose not to have one.

Read more about your directory listing status and options, and how to manage them: www.spark.co.nz/help/landline/manage/directory-listing/

You can check and update your directory listing in MySpark or by contacting us on 0800 800 123 (for consumers) or 0800 800 126 (for businesses).

Use of anonymised, aggregated mobile location data by Qrious

Qrious, a company that Spark wholly owns, uses large sets of anonymised aggregated mobile location data collected by Spark to provide insights to other organisations.

For example, there are often 6000 people in region 'A' at 1pm on Saturdays.

You can choose to have your anonymised mobile location data excluded from these large data sets by emailing us with your mobile number at privacy@spark.co.nz or contacting us on 0800 800 123.

Personalising your Spark experiences

Data sharing to personalise your online Spark experiences

We may share and receive some information about you with social media and advertising providers (e.g. Facebook/Meta and Google) and customer insights providers to help us personalise your experience of Spark across our and others' platforms, websites and apps.

You can opt-out of data sharing to personalise your online Spark experiences. Find the opt-out form in MySpark: signin.spark.co.nz/?goto=https://www.spark.co.nz/secure/myspark/opt-out-form/

If you opt-out, we will still partner with customer insights providers to understand your preferences, and you may still see ads and other information from us, but it may be less relevant to you.

Some social media and advertising providers allow you to adjust your privacy settings on those platforms. Read more about how these services are provided by Facebook/Meta and Google, and your options with them:

Household View

We may use information we collect about you and those you live with, to form a view of your household. This lets us provide you with products, services and offers that we think are most relevant to your needs. For example, offers that save you money based on the size of your household.

You can opt out of having information about you linked to your household. If you opt out, we may still hold information about your household that you expressly provide to us. Find the opt-out form online: www.spark.co.nz/help/other/terms/policies/privacy-opt-out/

Learn more about: How we collect your personal information (p5); How we use your personal information (p6); How we share your personal information (p7).

MySpark and Messaging

You can take control of your account by using MySpark on the Spark website and in the Spark app. It allows you to make some choices about your personal information. It also lets you do other useful things like viewing your bill, checking your mobile usage and changing plan options.

Messaging also lets you make choices about your personal information and you can contact us about requests or queries you may have. Our number is 0800 800 123 (for consumers) and 0800 800 126 (for businesses).

Sign up for MySpark at: spark.co.nz/myspark/register

Messaging on third party platforms (e.g. Facebook)

When you choose to message Spark from a third-party platform, such as Facebook, the nature of these platforms means that the platform provider you use may have visibility of any personal information shared in the chat. Please refer to the third party's privacy policy.

Accessing and correcting your personal information

Some information about you isn't readily available through MySpark, the Spark app or when you get in touch with our call centre teams. But you can still request to access it and have it corrected. For example, you can ask us for copies of phone numbers you've called or your historic billing records.

Spark's Call Investigation Centre manages these requests. Just fill out our personal information request form and our Call Investigations Centre will be in touch.

Form: www.spark.co.nz/forms/request-personal-information

Alternatively, you can write to the Spark Investigations Centre, PO Box 550, Wellington 6011.

View Appendix 2 (p15) for further information about requesting your personal information.

Making a privacy complaint

If you have any concerns that your privacy has been compromised in any way, please let us know.

Our Privacy Complaints process (Appendix 3, p18) will ensure your concerns are addressed promptly. Read the Privacy Complaints Process in Appendix 2.

You can also request investigation by the New Zealand Privacy Commissioner at any time during or after raising a complaint with us. You can do this by visiting the Privacy Commissioner's website (www.privacy.org.nz) or contacting the Office of the Privacy Commissioner on **0800 803 909**.

How to contact us

If you have general feedback or questions about this policy, or your privacy and rights, please email us at privacy@spark.co.nz or phone 0800 800 123 (for consumers) and 0800 800 126 (for businesses).

Appendix 1

Privacy Policy changes

We may update our Privacy Policy from time to time to reflect changes in the law and our practices. When we do, we will set out a summary of the changes. If the changes are significant, we may also advise you directly.

12 December 2025

We have updated the wording in 'How we share your personal information'. This change means that if we assign any amounts owed by you to us to a third party, we may need to provide information to the third party (the assignee) and their agents, advisers and service providers to enable them to manage and collect the amount owing.

16 October 2024

We have updated the list of 'Other privacy policies' provided in the introduction section of the Privacy Policy. We have removed Xtra Mail from this list, as the Spark Privacy Policy applies to Xtra Mail.

13 June 2024

The limited circumstances in which we may use communications content (like calls, texts or emails) or share it with third parties have not changed, however we have updated how we describe these circumstances, to make them clearer.

This wording has been updated in, 'Our promise to you', 'Personal information we collect' and 'How we use your personal information'.

[Learn more about our promise to you](#)

[Learn more about personal information we collect](#)

[Learn more about how we use your personal information](#)

31 October 2023

We've clarified some aspects of how we manage personal information in the following sections:

Our promise to you (p2)

We've clarified the limited circumstances in which it may be necessary for us to share communications content (like calls, texts or emails) with third parties. For example, this may be necessary to detect fraud or in emergencies involving health and safety.

How we collect your personal information (p5)

We've added social media, advertising and customer insights providers to the examples of third parties where we may collect your personal information from.

We've also updated the ways we may create information about you, adding that we may do this by combining your information with information we receive from social media, advertising and customer insights providers.

How we use your personal information (p6)

Where the policy talks about personalising user experiences, we've clarified that this includes forming insights about your experience of Spark and building a picture of the kind of Spark experiences you may be interested in.

How we store, manage and protect your personal information (p10)

We've clarified our use of both New Zealand-based and overseas partners in our data processing and storage activities.

Appendix 2

The following is information about managing your personal information with Spark. The Spark Privacy Policy includes a link to this information online. To make things easier for customers without internet, we have included it here.

Ask about your personal information

Manage your personal information with Spark

You can view, manage and update a lot of your Spark account information using MySpark online, the Spark app or by getting in touch with us.

For example, you can use MySpark to:

- Change your contact details, products and services
- Update your payment methods and plan extras
- Set account preferences, such as your directory listing status or marketing preferences
- View your account number
- View and query your Spark bills
- View your usage information, such as data used
- Manage who can use MySpark or the app to view, manage or buy on your Spark account. Please note, changes made to this setting in MySpark won't change who has authority on your Spark account.

Some things, such as managing your bills or tracking your usage, can be done through the Spark app. Or do any of it, plus manage your account authorities and more, by getting in touch with us.

Access and correct other personal information Spark holds about you

Some information about you isn't readily available through MySpark, the Spark app or when you get in touch with our call centre teams. But you can still request to access it and have it corrected. For example, you can ask us for copies of phone numbers you've called or your historic billing records.

Spark's Call Investigation Centre manages these requests. Just fill out our personal information request form and our Call Investigations Centre will be in touch.

Forms:

- Request information that Spark holds about me: www.spark.co.nz/forms/request-personal-information
- Request information that Spark holds about someone else:
<https://www.spark.co.nz/forms/request-information-about-someone/>

Alternatively, you can write to the Spark Investigations Centre, PO Box 550, Wellington 6011.

What will happen next?

Someone from Spark's Call Investigations Centre will be in touch to:

- Confirm your request and verify your identity.
- Discuss any charges that may apply. For example, the courier costs (if applicable) to send requested information to you.

Spark has 20 working days to respond to your request. If it will take us longer than that to process your request, we'll get in touch to explain why and to let you know when you can expect a response to your request.

If we need to transfer your request to another organisation, and you've indicated you're happy for this to happen, then we'll do that and update you within 10 business days.

If you've told us your request is urgent, we'll aim to prioritise it and get back to you as soon as we can.

We'll do our best to fulfil your request. But we may not fulfil all or part your request if we have grounds to refuse the request under applicable law, including the Privacy Act 2020. For example, if:

- We don't have the information that your request relates to, or it's not readily available despite reasonable efforts to locate it.
- We believe your request could compromise someone else's privacy through the unwarranted disclosure of their affairs.

If we can't fulfil all or part of your request, we'll be in touch to explain why.

If you're a Prepaid customer

If you're a Prepaid customer, we'll need a statutory declaration to confirm your identity.

You can use the Spark Mobile Information Request Authorisation form for this. You can download it from the link below, then fill it out and sign it with someone authorised to undertake statutory declarations. For example, a Justice of the Peace or lawyer.

Download the Spark Mobile Information Request Authorisation form:
www.spark.co.nz/content/dam/spark/documents/pdfs/digital-trust/spark-statutory-declaration.pdf

Will Spark have the personal information I'm after?

We generally only keep your personal information for as long as we need it, in connection with its original purpose. Once we don't need it anymore, we delete it or we anonymise it. When this happens, we can't recover it for you or link it to you. For example:

- We keep text messages for about a month
- We delete voicemail messages after a year
- We keep billing records for seven years

For general enquiries about privacy at Spark, please email privacy@spark.co.nz or contact us.

Appendix 3

The following is information about Spark's Privacy Complaints Process. The Spark Privacy Policy includes a link to this information online. To make things easier for customers without internet, we have included it here.

Privacy Complaints Process

As part of providing you Spark products and services, we do need to collect some personal details from you, our customers. Also, when you and others use our products and services, this can also generate information about you, such as calling records. We understand how important it is to you that those details are kept secure and private, and so we have robust and thorough processes to do just that. If, however, you feel that your privacy has been breached in any way, we have a process in place to ensure we investigate and address your concerns as quickly as possible – the Spark Privacy Complaints Process, which is outlined below.

Step 1

You can make a privacy complaint by calling our customer service team on 123. We will listen to your concerns and do everything we can to resolve them immediately.

Step 2

If we are unable to resolve your concerns within five working days, we will refer your complaint to our specialised Customer Resolutions Group.

Similarly, if you discuss your complaint with our 123 team, but are unhappy with the outcome, then you can contact our Customer Resolutions Group at privacy@spark.co.nz.

The Customer Resolutions Group will investigate, and may contact you directly for further information on your concerns.

They will then respond to you to advise

- whether or not Spark accepts your complaint;
- the reasons for Spark's decision;
- any further steps Spark proposes to take in relation to your complaint; and
- of your right to complain to the Office of the Privacy Commissioner.

If our Customer Resolutions Group is unable to resolve your concerns within five working days of us receiving your complaint, we will acknowledge your complaint in writing and let you know the expected timeframe for response. If we think resolving your complaint will take more than

20 working days, we will contact you to update you on our investigation and explain why it is going to take longer than usual.

Step 3

If you are not satisfied with the outcome of your complaint following receipt of a final response from Spark's Customer Resolutions Group, you may complain to the Privacy Commissioner. Please see below for more information.

Privacy Commissioner

At any point during or after your complaint, you may contact the Privacy Commissioner and request that they investigate your privacy complaint. For more information please visit the Privacy Commissioner's website (www.privacy.org.nz) or contact the Office of the Privacy Commissioner on **0800 803 909**.