

## **Appendix F: Privacy Policy**

Alistair Bean & Assoc's Financial Services Limited complies with the Privacy Act 2020 when dealing with personal information. Personal information is information about an identifiable person.

This policy sets out how we will collect, use and protect your personal information.

This policy does not limit or exclude any rights under The Act. There is more information on The Act at the Office of the Privacy Commissioner (<https://www.privacy.org.nz>).

### **What Personal Information Do We Collect**

In the course of providing services, we collect certain personal information from you when you provide that information to us, including via the website and any related service, through any registration or subscription process, through any contact with us (eg telephone call, email or in person), or when you use our services.

We may also obtain information from third parties where you have authorised this or the information that is publicly available. If possible, we will collect personal information from you directly.

### **What Personal Information Do We Collect About You**

We collect personal information in order to carry out the functions and activities required to provide our services to you. For example, if we are providing you with advice we will ask you a range of questions and collect information from you so that we have a good understanding of your financial position and objectives. This information may include:

- Your name and date of birth and information about your family.
- Your email address, postal address, residential address and contact telephone numbers.
- Financial information, such as your bank account number, your tax status and associated tax identifying numbers, your financial goals and objectives, your income and expenditure, your current and past personal financial circumstances, including information relating to your assets, liabilities and investments (such as KiwiSaver, Equities, Bonds, Term Investments, Insurance) and any other information that we may request or require in order to obtain a full understanding of your personal financial circumstances and objectives.
- Specific documents to verify your identity (such as drivers license and passport) and proof of address (such as utility bill).
- Information required to determine your suitability for the services we offer (such as a risk questionnaire).
- Information about which of our services you use and how you use those services including the activities and transactions you undertake.
- Any correspondence between us.
- Preference information such as your marketing preferences.
- Trust Deed and all Associated Individuals.
- Company Certification of Incorporation and Associated Individuals.

- Evidence of Source of Funds or Wealth as required for AML/CFT.
- Names and contact details for Lawyer and Accountant and information as to currency of Wills and Enduring Power of Attorney.

#### **How We Use Your Personal Information**

- To provide agreed services.
- To open accounts in the name of yourself, your Trust or your Company.
- To verify and evidence your identity and address.
- To contact you and keep you up to date with relevant market information and opportunities.
- To recommend appropriate investments and provide advice.
- To provide investment updates and reports.
- To transfer funds as authorised by you.
- To comply with our legal and regulatory obligations.
- For any purpose authorised by you or the Act.

#### **Who We May Disclose Your Personal Information To**

- Financial Institutions that we engage with for the purposes of providing our service to you, such as our Platform Provider and Custodian (currently Consilium / FNZ).
- Third parties to meet our regulatory and legal obligations and for the purposes of carrying out checks to satisfy our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009.
- External Professional service providers (such as Information Technology Experts).
- External Professional websites (such as Mailchimp, whose services we use to send you relevant market information and newsletters).
- Professional Indemnity Insurance provider.
- Any other person authorised by the Act or another law (eg a law enforcement agency).
- Any other person authorised by you.

Providing some information is optional. If you choose not to enter Identification Information, we will not be able to provide any services offered by Alistair Bean & Assoc's Financial Services Limited.

#### **Protecting Your Personal Information (including cyber security)**

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse. We will not sell or rent your personal information to any third party. We keep your information safe by:

- storing electronic information with password protection and where appropriate with 2 Factor Authorisation

- hard copy information in locked cabinets in locked premises and only accessible by employees
- outsourcing Website and IT security safety with due diligence to qualified experts to manage and monitor online backups, disaster recovery, firewalls, virus and ransomware protection for the prevention of unauthorised access or attacks and to resolve these issues.

After termination of investments, we are required to keep your information for 7 years at which point we delete all electronic information and securely destroy paper-based information by shredding all documents and forwarding to a document destruction services provider.

### **Problems and incidents**

Should any security problems or incidents arise that affects clients, then every effort will be made to contact you immediately to remedy the situation. Where there is a requirement to advise authorities then this will occur as required by regulations, conversely you may also contact us should you notice any bugs in the system (details below). Any incidences will be investigated, monitored, rectified and followed up as necessary.

### **Accessing and Correcting Your Personal Information**

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong.

If you'd like to ask for a copy of your information, or to have it corrected, please contact us at [alistair.bean@abafs.co.nz](mailto:alistair.bean@abafs.co.nz), or 021-552587, or Alistair Bean & Assoc's Financial Advisers, Level 1, The Awly Building, 293 Durham Street, Christchurch, 8013.

### **Email Communications**

We strive to only send emails to those who want to receive it. If you would not like to receive future emails from us, please use the "unsubscribe" link that is locations at the bottom of our email communications.

### **Accessing Our Websites**

We do use technologies such as Cookies and third-party website trackers such as Google Analytics on our website.

Google Analytics services are used to collect information on how you use our website, aggregate website statistics anonymously, such as the number of page views, the number of unique visitors, time spent on our site and to determine advertising effectiveness.

Cookies are small pieces of information or data that the website can send to your browser, which may then be stored on your computer's hard drive (persistent cookies) or its memory (session cookies). Cookies also understand which parts of our website are the most popular, where visitors are going and how long they spend there. We can use cookies to learn how we can make our website more useful and interesting for you. You may be able to adjust your browser settings to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it.

### **Changes to this Policy**

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