

Privacy Statement

We are committed to protecting privacy and confidentiality in accordance with the Privacy Act 2020 (“**Privacy Act**”), and it is one of our prime responsibilities that any personal or sensitive information provided to us is not used for any other purpose than that which is intended and expected. This Privacy Statement outlines our practices for collecting, handling, using and disclosing personal information. It also explains how to complain about a breach of the privacy laws, how you can access the personal information we hold about you, and how to have that information corrected.

This Privacy Statement applies to:

Crowe New Zealand Audit Partnership

Findex Advice Services NZ Limited

Findex NZ Limited

TEO Training Limited

Collectively, these entities are referred to throughout this statement as **Findex, we, us** or **our**.

What information do we collect and hold?

Findex may ask for various kinds of personal information to the extent this information is necessary for us to carry out the activities involved in providing you with products, services and information. The kinds of personal information include, but are not limited to:

- identification information, including but not limited to, name, address, contact details (including phone number, email address and other digital addresses and accounts, date of birth, IRD number as well as information to verify your identity such as drivers licence, birth certificate or passport details;
- financial information, including but not limited to, your assets, liabilities, income, expenses, bank and direct debit details, KiwiSaver, insurance details and other financial details;
- employment information, including but not limited to, NZBN/Company number, occupation, salary, hours of work, employment history dates;
- Screening checks (including but not limited to police, working with children, bankruptcy), reference checks, and other associated insights;
- transactional information of your dealings with us, including in relation to our products and services, making a record of queries or complaints an individual makes and, if they make an insurance claim, collecting additional information to assess the claim;
- insights, responses to surveys such as experiences and information about your activities, interest, and attitudes/views or other feedback expressed;
- your device information such as device ID, geo-location, computer and connection information, statistics on page views, traffic to and from our websites, ad data, IP address and standard web log information;
- any other personal information that may be required in order to facilitate your dealings with us.

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Personal information means information about an identifiable individual and includes information relating to a death that is maintained by the Registrar General under the Births, Deaths, Marriages and Relationship Registration Act 2021 or any former Act (as defined in Schedule 1 of that Act). Common examples of personal information include name, address, photos of their face, their opinions or views, employment information and financial records.

Sensitive personal information requires a higher standard of protection. While the Privacy Act does not prescribe fixed categories of sensitive personal information, certain personal information is inherently sensitive. This includes health, genetic, biometric, and financial information. Personal information of children and young people is also considered sensitive. Sensitive personal information should not be collected unless it is necessary for a lawful business purpose. If sensitive information is to be collected, the individual must be aware of the collection and the purpose it is being collected for.

Generally, we only collect this sort of information if it is necessary to provide a specific product or service. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify identity or authorise transactions.

Where we collect your personal information from others

If we collect your personal information from someone other than you, we will take reasonable steps to make sure you are aware of the following as soon as reasonably practicable, unless an exception under the Privacy Act applies:

- that we have collected your personal information;
- why we collected it (the purpose of collection);
- who we intend to share it with (the intended recipients);
- the name and address of the Findex entity collecting your personal information and the entity that holds it;
- if the collection is required or authorised by law, the law concerned; and
- your right to access your personal information and to ask us to correct it.

What if you choose not to provide some information?

We may be unable to provide services if we do not have all the relevant information required to deliver such services.

For what purposes do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to facilitate the provision of our service offerings. This includes:

- checking whether you are eligible for a product or service
- The facilitation of services or products

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- Providing information that you request and/or providing you with further information about our other products and services
- Assessing your prospective and ongoing suitability for employment or working arrangements with Findex, including conducting screening (including but not limited to police, working with children, bankruptcy) checks, reference checks, and other associated insights;
- Conducting testing, surveys, research, insights and analytics (including through our third-party service providers); and /or
- Understanding and meeting your needs, including tailoring the content of our websites, emails, apps and social platforms to your preferences.

We will only use your personal information for the purpose for which it was collected, or a directly related purpose, unless the Privacy Act permits us to use it for another purpose. If we need to use your personal information for a purpose other than that for which it was collected, we will provide information about the new purpose and any additional relevant information prior to using your personal information in a new way. We will seek your authorisation before doing so.

We may also use information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm in relation to its products or services and to help run the business. We may also use information to tell you about products or services that may be of interest to you.

What service offerings do we provide?

We understand the importance of a holistic service offering, whereby clients can see their goals, needs and expectations being met. This approach encompasses:

- Wealth Management
- KiwiSaver
- Lending
- Accounting & tax compliance
- Risk Insurance, including Accident Compensation Corporation
- Specialist Services, including tax advisory
- Business Advisory
- Corporate Finance
- Audit and Assurance
- Corporate Benefits
- Management Consulting
- HR Consulting

- Payroll Services

How do we hold and protect your information?

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. Much of the information we hold about you will be stored electronically in secure data centres, which are located in Australia, and owned by either us or external service providers. This does not include third parties backing up or mirroring data in overseas jurisdictions. Some information we hold about you will be stored in paper files and these files may be held in secure offsite storage. We use a range of physical and electronic security measures to protect the security of the personal information we hold.

We take reasonable steps to destroy or permanently de-identify any personal information after it is no longer required to be held.

We do not use identifiers assigned by the Government, such as a IRD number or insurance provider number, for our own file recording purposes.

Will we disclose the information we collect to anyone?

We may provide personal information about you to external organisations. This may include recipients which are located outside New Zealand, including:

- Any financial institution you hold an account with overseas and have given Findex permission to make enquiries on your behalf
- Other members of the Findex Group located outside New Zealand, in some circumstances

We will not disclose personal information to a recipient outside New Zealand unless:

- the recipient is in a country prescribed by regulations as having comparable privacy safeguards;
- the recipient is required to protect the information in a way that, overall, provides comparable safeguards to those in the Privacy Act — for example, through a binding contract, or because the recipient is subject to privacy laws or a binding privacy scheme that provides comparable safeguards;
- the individual expressly authorises the disclosure after being told that the recipient may not be required to protect the information in a way that, overall, provides comparable safeguards to those in the Privacy Act; or
- another exception under IPP 12 applies, including where the disclosure is necessary to avoid or lessen a serious threat to public health or safety or to the life or health of any individual.

To protect personal information, we enter into contracts with service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

We may also disclose your personal information to others where:

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- We are required or authorised by law or where we have a public duty to do so;
- You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- We are otherwise permitted to disclose the information under the Privacy Act.

Do we use or disclose personal information for marketing?

We will use personal information to offer you products and services we believe may interest you but will not do so if you tell us not to. We may offer you products and services by various means, including mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through our website.

We may also disclose your personal information to external companies who assist us to market our products and services to you, such as a mailing house.

If you do not wish to receive marketing offers from us, you must expressly request it.

Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

Each time you visit one of our websites, we collect information about your use of the website, which may include the following:

- The date and time of visits;
- Which pages are viewed;
- How users navigate through the site and interact with pages (including fields completed in forms and applications completed);
- Location information about users;
- Information about the device used to visit our website; and
- IP addresses.

We use technology called cookies whenever you visit our websites. Cookies are small pieces of information stored on your hard drive or in memory. Cookies can record information about your visits to the site, allowing it to remember them the next time you visit and provide a more meaningful experience. Cookies are designed so that they cannot be sent to another site or be retrieved by any non-Findex site.

How can you check, update or change the information we are holding?

Under the Privacy Act, you have a right to seek access to information which we hold about you, though there are some exceptions to this. You also have the right to ask us to correct information about you that is inaccurate, incomplete or out of date. To do so, you must contact us.



We do not charge for receiving a request for access to personal information or for complying with a correction request. We do, however, reserve the right to charge you for all reasonable costs and outgoings specifically incurred in meeting your request for information.

Tell us what you think

If you have any questions, comments, concerns or complaints, please email our Privacy Officer at complaints@findex.com.au.

We will acknowledge your complaint as soon as practicable after receiving it and let you know if we need more information to resolve it. We aim to resolve complaints within five working days, although some may take longer. If this happens, we will keep you updated and tell you when you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to. Under the Privacy Act, you may complain to the New Zealand Privacy Commissioner about the way Findex has handled your personal information.

The Commissioner can be contacted at:

Office of the Privacy Commissioner

PO Box 10-094

The Terrace, Wellington 6143

Phone: 0800 803 909

Email: enquiries@privacy.org.nz

Website: privacy.org.nz

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