



PRIVACY POLICY

This Privacy Policy is for Gold Band Finance Limited's ("Gold Band") customers. It sets out how we (Gold Band Limited) comply with the requirements of the Privacy Act 2020.

Trust means a lot to us at Gold Band. We're in the business of investing in people and to do that we have to ask our customers for some information about them, including sensitive information about their finances. We know how important it is for you to trust us when you provide such information. Your privacy is very important to us, so we are committed to transparency in how we collect and use your information.

During the course of our relationship with you, we may tell you more about how we handle your information as the need to use it arises. For example, when you complete a loan application, we'll tell you that we will collect personal information about you from credit reporters. When we provide further information, please consider it carefully.

Nothing in this Privacy Policy alters your rights under the Privacy Act 2020. If you would like to learn more about these rights, please visit www.privacy.org.nz.

Your consent to our collection, use and disclosure of your personal information

By using our products and services, you consent to your personal information being collected, held and used by us in accordance with this Privacy Policy.

Please ensure that you review this policy carefully so that you are informed as to what information we need, why we need it and how we use it.

If you would like further information about our privacy practices, please contact us by calling us on **0800 55 3000**, emailing us at admin@goldbandfinance.co.nz or writing to us at "The Privacy Officer, Gold Band Finance, PO Box 713, Christchurch 8140".

The personal information we collect about you

We collect personal information from you in a number of ways when you request or use our products or services.

We will usually collect information from you directly – such as in the application form you complete for us sometimes we have to ask a third party for information about you – such as a credit reporter or public register. We may also collect personal information about you from your broker or from other financial service providers.

Where we collect personal information about you from third parties, we'll do so only with your consent or if we have a lawful basis to do so. You consent to us approaching third parties when you complete our application forms. For this reason, it's important that you read these forms carefully.

We may also collect information about you that is in the public domain for the purposes of our customer due diligence.

The personal information we collect about you may include:

- contact details, including your name, address, email address and phone number;
- relationship information;
- employment information;
- IRD number;
- details of your assets and liabilities;
- credit information (from credit reports);
- criminal history information (where that is publicly available);
- information from the Personal Property Securities Register or other public registers;
- copies of your identity documents (such as your passport, drivers licence, or other government issued identity document); and
- information about you contained in publicly available sources, such as in the media or on the internet.

Where you are engaging us on behalf of a company, trust or partnership, we may also request some personal information about any directors, trustees, owners or other controlling entities of your organisation, or of anyone who has authority to act on your organisation's behalf. In certain scenarios we may be required by law to collect your personal information, including under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009.

If you choose not to share some items of personal information with us, we may be unable to offer you some or all of our products or services, particularly if you refuse to provide information that we are required by law to collect.

Additional information collected when you access our website

We also collect additional information from you when you access our website. This includes information about your device, web browser, mobile phone carrier, location and IP address. This helps us to detect any suspicious activity and to improve the user experience of our website.

Our website may contain links to third-party websites. If you follow a link from our website, please be aware that the owners of that site will not be bound by our Privacy Policy and may have their own policy in place. We suggest that you review that site's policy prior to disclosing your personal information to them.

The way we use your personal information

We primarily use the personal information we collect about you to decide whether we can lend you money or otherwise do business with you. We also use your information to manage our relationship with you over time. This can include ensuring that you continue to be an acceptable risk for us.

We may use your personal information for the following purposes:

- identifying you and ensuring that we can comply with our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009;
- assessing and deciding on applications for loans or investments;
- administering the loans or investments we provide;
- managing our relationship with you or your broker;
- improving the products we offer and ensuring they're meeting your needs;
- to conduct research on and undertake statistical analysis of use of our products and services (on an anonymised basis where possible);
- to contact you and to respond to communications from you;
- identifying and telling you about other products or services we think you may be interested in where you have consented us doing so;
- managing and monitoring our risks, including identifying and investigating any illegal activity such as fraud;
- recovering any unpaid debts or other monies owing; and
- complying with our legal and regulatory obligations and any lawful requests from government agencies or regulators.

We may also use your personal information for other purposes, without your consent, where those uses are permitted by law.



Who we disclose your personal information to

As a financial service provider, we must at times disclose personal information to third parties in order to meet the purposes set out in this Privacy Policy.

Generally, we'll only disclose your personal information in the ways set out below. If we need to disclose information for other purposes, and it's not practicable to obtain your consent to do so, then we'll only disclose that information if permitted by law.

We may disclose your personal information to:

- any third parties you authorise us to disclose your personal information to;
- any person with whom you hold a joint loan or investment product;
- any potential assignee or sub mortgagee of your loan facility;
- your broker at loan origination;
- your broker on an ongoing basis, if you consent to this;
- credit reporters, both at the time you apply for a loan and occasionally during your relationship with us;
- other financial service providers or motor vehicle dealers where required to administer a loan or manage a shared security over personal property;
- government or law enforcement agencies, including regulators, where permitted or required by law;
- the Insurance and Financial Services Ombudsman if you've made a complaint;
- our directors and independent trustees, generally only at an aggregated level; and
- suppliers of outsourced functions, such as our lawyers, auditors, debt collection agencies, repossession agents, private investigators or data storage providers.
- reputable third parties that we have a business relationship with, including marketing companies.
- other third parties that process anonymised statistical information.

How we keep your personal information secure

Storage of personal information

The personal information we collect about you is stored on a local server owned and controlled by Gold Band Finance Limited. We also regularly back up our server to our trusted data storage provider located in New Zealand. We do not store any of our information in the cloud or overseas.

Our security safeguards

We take all reasonable steps to ensure that your personal information is protected against loss, unauthorised use, access or disclosure and any other misuse.

At Gold Band, we believe that privacy is everyone's responsibility. Our employees have been trained to understand the Privacy Act and the obligations it places on us. We all adhere to a number of policies and practices designed to ensure that your personal information is safe and secure. For example, we:

- encrypt the information we send to our data storage provider, who stores it in encrypted form on its servers;
- ensure that any personal information we email to you or any other third party is sent as a secure PDF;
- take reasonable precautions to verify the identity of people requesting personal information from us; and
- make sure our employees understand that personal information may only be accessed or used for legitimate work purposes.

We retain your personal information only for as long as we need it. Generally, this means that we must retain your information at least for as long as you're a customer and usually for a number of years afterwards, to enable us to comply with our regulatory obligations and any legal action we may be required to respond to.

We destroy the personal information we no longer need in a secure manner.

Our procedure in the event of a security breach

In the event that a security breach occurs resulting in the loss, unauthorised use, access, disclosure or other misuse, we will:

- take all steps reasonably possible to contain the breach;
- assess the extent of the breach and potential for serious harm to you;
- if we conclude that the breach may result in serious harm to you, we will inform both you and the Office of the Privacy Commissioner within 72 hours of discovering the breach.
- investigate the cause of the breach and put processes and procedures in place to prevent a similar breach from reoccurring.

Your right to request a copy of your personal information

You have the right to request a copy of any personal information Gold Band holds about you. The types of information we may hold about you are listed in this Privacy Policy. Please note that you can only request personal information about yourself, unless you have the consent of another party to request information on their behalf.

You can also make a request for your personal information through your broker or another representative. Your representative will need your written consent to make this request, so please make sure you provide this to them.

You can request a copy of your personal information by calling us on 0800 55 3000, emailing us at admin@goldbandfinance.co.nz or writing to us at **The Privacy Officer, Gold Band Finance, PO Box 713, Christchurch 8140.**

Whichever way you make your request, we must take steps to ensure that you're authorised to do so. This might involve asking you some security questions, checking your identity documents or verifying your signature. Please understand that we must do this in order to protect your privacy.

The Privacy Act permits us to withhold personal information from you in certain circumstances, such as where the information is commercially sensitive or legally privileged. We might also refuse to provide you with information that is also about other people if we think this would be unwarranted. If we withhold information from you, we'll tell you why.

We're required by the Privacy Act to make a decision on your request – and convey this to you – within 20 working days. However, we'll usually respond to you more quickly than this. Where we cannot make a decision within 20 working days, we'll let you know and explain why.

Your right to correct your personal information

You also have the right to request the correction of personal information Gold Band holds about you, if you believe it's inaccurate.

To request the correction of information, you should follow the same steps as are set out above for requesting a copy of your personal information. Again, we must respond within 20 working days but will try to respond sooner. Where we do not agree that the information is inaccurate, and we refuse to correct it, if appropriate we'll attach your request to the disputed information as a "statement of correction".



Any questions or complaints

Where we have refused a request for access to, or correction of, personal information or where you have any other concerns about the way we have handled your personal information, you have the right to make a complaint.

In the first instance, please let us know about your concerns by asking to speak with our Privacy Officer using the contact details set out above. We'll do everything we can to put the matter right, but if we can't resolve your complaint for you, then you have the right to make a complaint to the Office of the Privacy Commissioner by:

- completing an online complaint form at www.privacy.org.nz
- writing to the Office of the Privacy Commissioner, PO Box 10-094, The Terrace, Wellington 6143.

Amendments to this policy

From time to time we may amend this Privacy Policy, to reflect the evolution of our business, products or services. Should our Privacy Policy be updated, we will post a notice on our website stating this. Please make sure you review this policy periodically to ensure you're up to date with our privacy practices..

