

Privacy Policy

Privacy is important to us and our related businesses, and our privacy policy protects the personal information (i.e. information about an identifiable individual) we collect, store, use and disclose. By using our website or submitting personal information to us, you consent to the collection, storage, use and disclosure of your personal information in accordance with this policy.

The Office of the Privacy Commissioner (www.privacy.org.nz) provides further details of the New Zealand Privacy Act and how it protects personal information in New Zealand.

The Information We Collect

You may give us personal information about yourself (such as your name, address, email address, telephone number or driver license number) via our website or when you complete our documents such as a Contract for Sale or an Investor Letter. Providing this information will always be optional for you. However, some services may not be available to you if you choose not to provide it.

When you visit our website we may collect more personal information, such as the address of your Internet service provider, the name of the web page directing you, and your clicks and activity on our site.

We operate our website for the use of policyholders, investors and advisers (collectively referred to as our “clients”) and maintain a separate database of clients who have either used our services in the past or who hold registers of life insurance policies suitable for transacting with us. As part of our operations, we may gather certain types of information about you (our client) including:

1. Personal Information - as provided by you when you transact business with us or when you register for services that we may offer. Examples of these services could include email newsletters or competitions.
2. Aggregated Data – i.e. information generated by our systems as they track traffic through our sites. This information does not identify you personally and is not linked to any personally identifiable information that you may have provided.

How Do We Use the Personal Information?

We collect information in order to provide the best possible service to you while you are conducting business with us or while you are visiting our website. To this end we may use the information that you provide for the following purposes:

1. To verify your identity when transacting business with us.
2. To enter into agreements and/or provide services to you, to process your transactions, to administer your account, to conduct credit and other checks, for our own internal purposes (such as risk management, staff training and billing), to facilitate our online services (including to provide the services on our website), to help us to develop our website to be more available and user friendly.

3. To help provide any other services that you have requested.
4. To offer the most relevant information suitable to you and your interests.
5. For any marketing, promotional, publicity, direct marketing or market research that we or others might undertake. However, we will not do this by email or text (except as part of an email which facilitates, completes or confirms a transaction with you, or provides updates regarding the services we provide) unless we have your express, inferred or deemed consent to do so. These emails and texts will always include an "unsubscribe" facility (for further details on how to unsubscribe see "Opting In and Opting Out" below).
6. For any other use associated with such purposes or for which you have given permission.

Some uses of your personal information may involve the transfer of that information outside New Zealand, to be held and used by our related companies and business partners.

Who We Share This Information With

We do not sell, trade or rent your personal information to others without your consent.

However, we do use other companies and individuals to perform services on our behalf. They will have access to your personal information needed to perform and provide these services, but we will not authorise them to use your personal information for other purposes.

Generally, we will only share information that we collect with any third parties in the following circumstances:

1. Where the information we collect, store, use or disclose is hosted with a service provider. Our agreements with them protect the information that we collect from any use by them that we have not authorised.
2. Where the information is aggregated data (not personally identifiable information). We may share such aggregated data with third parties such as advertisers or business partners.
3. Where we believe in good faith that we are required by law to share your personally identifiable information with third parties.
4. Where we have your consent (which we would usually obtain at or before the time of collection) to share the information with specified third parties, and that includes any of the purposes for which we may use the information as described or contemplated in "How Do We Use the Personal Information?" above.

What About Links to Other Websites?

Our website may contain links to other sites that are not under our control. We have no responsibility for linked websites, and provide them solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements,

representations or warranties about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

Opting In and Opting Out

We are committed to full compliance with the Unsolicited Electronic Messages Act.

You may have the option to subscribe to certain promotional and marketing email and/or text communications. By subscribing to our email and/or text communications, or otherwise providing us with your email address and/or mobile number, you consent to receiving emails and/or texts (as the case may be) which promote and market our products and services, or the products and services of others, from time to time.

You can opt out of those communications at any stage by utilising the corresponding "unsubscribe" facility. This means you may change your mind at any stage about participating in any of our member services. Once you have unsubscribed from our email or text communications, we will remove you from the corresponding marketing list as soon as is reasonably practicable.

Can We Change This Policy?

We may review this policy from time to time and will notify any changes by posting an updated version on our website. Your use of our website following any updates constitutes acceptance of this policy as amended. We recommend you regularly review the policy when you visit our website.

Your Right to Access Your Information

You may obtain confirmation from us as to whether or not we hold personal information about you. You may also request access to or a copy of the information, and/or request that corrections or changes are made to it. Please contact us via the Policy Exchange contact details on our website.