

Privacy Policy

Version 2

This Privacy Policy sets out how Complectus complies with the New Zealand Privacy Act 1993 when dealing with personal information. This Policy details what personal information is collected, how it is used and stored, and how this information can be accessed. All employees of Complectus members are required to use their best endeavours to prevent the disclosure of any confidential information protected under the Privacy Act 1993.

Contents

- 1. PURPOSE OF POLICY 3
- 2. APPLICATION AND SCOPE 3
- 3. DEFINITIONS 3
- 4. PRIVACY 4
- 5. CONFIDENTIALITY 7
- 6. REVIEW PROCESS 8

1. Purpose of Policy

Complectus complies with the New Zealand Privacy Act 1993 (the Act) when dealing with personal information.

The collection of personal information is essential to enable us to conduct our business and provide our range of products and services (“services”). We recognise the importance of safeguarding personal information. This policy sets out how we will collect, use, disclose and protect personal information.

The Complectus Privacy Officer is the Head of Risk and Compliance.

2. Application and Scope

This policy applies to Complectus Limited and all of its wholly owned subsidiaries (collectively “Complectus”) and all of its employees, including directors, officers, and contractors (collectively “employees”). For the avoidance of doubt, “contractors” means individuals on a fixed term contractors’ agreement regardless of whether they are contracting through a company or not.

This policy and its related policies, is a component of the overall Risk & Compliance framework.

Related policies include:

- Data Protection Policy;
- Client Verification Policy and Procedure; and
- Mobile Device Policy.

3. Definitions

Personal Information - information about an identifiable individual (a natural person).

Confidential Information - any information relating to the business or financial affairs of Complectus, which has come to the knowledge of the employee or which has been disclosed or might reasonably be understood to have been disclosed to the employee in confidence, other than information that is already public knowledge or which is obvious or trivial. Confidential information insofar as Complectus is concerned will include:

- a) Any trade secrets, specialist know-how or practices in our industry or any other industry in which Complectus may from time to time engage in business, customer lists, customers requirements e.g. client instructions, performance reports or profitability figures or reports;
- b) Profitability of contracts, margins or products and other financial information in relation to the our business or in relation to any customers that are of or may be of commercial value to a competitor; and
- c) Information pertaining to any other employee of Complectus, which is protected from disclosure under the Privacy Act 1993.

4. Privacy

What information does Complectus collect?

We are committed to our obligations under the Act relating to collecting personal information. In order to provide our services, it is essential we collect and process some personal information.

The information we collect can include:

- Information provided by individuals when using our services. This includes information provided at the time of registering or utilising any of our services, interacting with our staff, or posted material.
- A copy of the correspondence or contact information collected during the correspondence.
- Details of transactions carried out with our team or using our technology including the fulfilment of these transactions.
- Details of visits to our websites including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources accessed.
- We may also ask for surveys to be completed for research purposes, although individuals do not have to respond to these requests.

IP Addresses

We may collect information about individual's computers, including, where available, IP address, operating system and browser type, for system administration and to report aggregate information for our advertisers. This is statistical data about our users' browsing patterns and actions, and does not identify any individual.

Cookies

In order for us to provide the services, individuals may be asked to access websites operated by Complectus. These websites use cookies to improve and personalise the user experience. Cookies are small text files, which are placed on the user's computer when they access a website or application. They are a common feature used by many websites and other applications. Cookies do not have the capability to perform actions by themselves. They can be used for tracking, authentication, marketing and managing user information. Most browser technology will allow users to prevent the browser or device to accept cookies. This may result in certain functions of the website being diminished.

How does Complectus use personal information?

We may use personal information:

- To establish an individual's requirements and provide the appropriate product or service;
- To set up, administer and manage our products and services;
- To understand an individual's needs and improve our products and services, including training and developing our staff and representatives;

- To verify an individual's identity;
- To communicate with an individual;
- To protect our rights;
- To ensure the secure and proper operation of our websites;
- For internal research purposes;
- For any other use the individual authorises;
- In any other way set out in this Privacy Policy.

We are required by the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 to collect personal information to verify an individual's identity. Therefore, the collection of certain personal information will be mandatory.

Sharing information

We use and disclose personal information for the purposes we collected it.

We may use and disclose personal information for a secondary purpose only if the secondary purpose is directly related to the purpose of collection.

When necessary and in connection with the purposes listed above, we may disclose personal information to:

- Subsidiaries, related companies or joint venture companies where required or authorised under our relationship.
- Information technology providers, including hardware and software vendors and consultants such as programmers, for the development or delivery of our services only.
- Customer research organisations, solely for the purpose of service improvements, however, not for direct marketing purposes.
- Intermediaries including an individual's agent, adviser, broker, a representative acting on the individual's behalf, or our authorised representatives and our agents.
- Accounting and financial specialists, trustees associated with funds, government, law enforcement or statutory bodies, professional advisors, administration or business management services.
- Printers and mail service and delivery providers for the mailing of statements and marketing material.
- Imaging and document management services.

When appropriate, to ensure an individual's Will can be found, we may register whether the individual's Will is stored with Perpetual Guardian on the NZ Will Registry website or on the website of any other Will registry.

Additionally, if an individual has not opted out of receiving marketing material from us, we may also provide contact details to carefully selected third parties who we reasonably believe provide products or services that may be of interest to, or who have contracted with us to keep the information confidential, or who are subject to obligations to protect the personal information.

Disclosure overseas

There are also instances where we may have to send personal information overseas or collect personal information from overseas. These instances include:

- When an individual has asked us to do so.

- When we are authorised or required by law to do so, including in response to any order from any regulator or court in any jurisdiction.
- When we have outsourced a business activity or function to an overseas provider with whom we have a contractual arrangement.
- Certain electronic transactions.
- When it is necessary in order to facilitate a transaction on an individual's behalf.

We will only send information overseas or collect personal information about an individual from overseas for the purposes in this policy document.

Access

Individuals are entitled to obtain confirmation from us that we hold personal information about them and can request access to that personal information by contacting us. When a request is received, it is referred to the Privacy Officer, who will respond within 20 working days.

In some circumstances, we are able to deny the individual's request for access to personal information. If we deny the individual's request, we will tell them why.

If accessing personal information will take an extended period of time, we will inform the individual of the likely delay. For more detailed requests for access to information, an administration fee may be charged to cover the associated cost of supplying this information.

Correction

If the individual believes the information we hold about them is incorrect, the individual may ask for it to be corrected. If we decline to correct the information, the individual may request a statement is attached to the information that a correction was sought but not made.

Personal Information Storage

We will take all reasonable steps to ensure that the information we use, collect or disclose is accurate and stored in a secure environment and will endeavour to store personal information on secure servers and encrypt any passwords and transaction details an individual provides to us.

We will use every security precaution reasonably available to us to maintain the security of personal information. However, there are risks inherent in transmitting and storing data online. As such, we cannot guarantee data sent or stored electronically will be secure, and any information provided to us is at the individual's own risk.

Please refer to the Data Protection Policy for further information about the procedures we have in place to ensure the secure storage of information.

It is our responsibility to manage a privacy breach and we will do so in accordance with our Incident and Breach Procedure and the Data Protection Policy. We will endeavour to contact individuals if any security breaches compromise the security of their personal information.

Marketing

We would like to use and disclose personal information to keep individuals up to date with the range of products or services available from us. Generally, we will use and disclose personal information for our marketing purposes, and may use individual's information in other aspects of our business.

If individuals do not want us to use and disclose their personal information for the purposes of marketing products and in our general brand marketing, the individual should opt out of this on our website.

General

Third parties and external links may appear on our website. They are not governed by this Privacy Policy and we are not responsible for them. Individuals should check the privacy policies of the relevant third party.

This Privacy Policy is governed by New Zealand law and the New Zealand courts have jurisdiction.

Individuals can contact us by:

1. Email on privacyofficer@pgtrust.co.nz;
2. Telephoning us on 0800 87 87 82; or,
3. Writing to us at Privacy Officer, Perpetual Guardian, PO Box 1934, Auckland 1140.

5. Confidentiality

We require all employees of Complectus members, during the continuance of their employment, and after termination to:

- a) Use their best endeavours to prevent the disclosure of any confidential information protected from disclosure under the Privacy Act 1993; and
- b) Other than in the course of their duties, not disclose confidential information which includes personal information to any client or employee, unless it is to the person the information is about or that person has authorised the disclosure.

If the employee breaches the above provisions in relation to confidential information during their employment, with Complectus, then the employee may be subject to disciplinary proceedings, including dismissal.

If the employee breaches any of the above conditions after termination of their employment, then the employee may be subject to an action being pursued by Complectus in the Employment Relations Authority or above for breach of contract.

6. Review process

The Head of Risk and Compliance will review this policy annually and ensure it remains relevant, and is continually improved.

This also includes considering the Perpetual Guardian Group's relevant activities and functions including obtaining management sign off.

Version Control	Date Effective	Author	Summary of change
1.0	27/06/2016	Lincoln Watson	Version released
1.1	30/06/2016	Lincoln Watson	Version amended
1.3	08/07/2016	Kelly-Ann Harvey	Version amended
2	9/06/2017	Annika Tombleson	Version amended to include reference to related policies and include a section on confidentiality.

Authorised by:	Lynne Carroll	Signed
Date:	10 July 2017	
Document Control Number:	Version 2	