



BRITANNIA
Financial Services Ltd

BRITANNIA AND NZ ENDEAVOUR GROUP

Privacy Policy



Document History

Version	Date	Amendments
V1	28/09/2017	Initial approval
V2		

Document administration

Policy owner	Gavin Dixon	CEO
Approver	Board	Date: 28 September 2017
Review time frame	Annually	
Next review date	Nov 2018 (to align with other annual policy reviews)	



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Purpose

We know that how we collect, use, disclose and protect your information is important to you, and we value your trust. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

The purpose of this Privacy Policy is to inform our clients, members of our superannuation schemes and any users of our web site how we comply, in New Zealand, with the requirements of the Privacy Act 1993, in managing personal information.

Consent to Privacy Policy

Please note that when you are contacting us through our website you are agreeing to this Privacy Policy so if you do not agree, please do not use our website but feel free to call us on 0800 500 800.

Collection of personal information

Personal Information is defined in the Privacy Act 1993 as information about an identifiable individual (a natural person as opposed to a company or other legal entity) and which is in a form which enables that person to be identified.

The types of personal information we collect will vary depending on the nature of your dealings with us. At all times we try to only collect the personal information that we require for what we are doing. Where reasonable and practicable, we will collect your personal information directly from you and inform you that this is being done and we mainly collect personal information about you when you give it to us, for example:

- a) Over the telephone or skype e.g. when you contact our financial advisers;
- b) Via our website, or Facebook page;
- c) When you write to us; or
- d) When you participate in a marketing campaign or promotion (or a similar event) administered by us or our representatives.

Generally, the types of personal information we collect and hold may include your name, email address, postal address, physical address, date of birth, telephone number, details relating to your use of any product and/or service offered by us, and details of your enquiry notified to us and any other preferences you tell us about.

We may also collect personal information about you from:

- a) Publicly available sources such as white pages;
- b) Your professional advisers e.g. your solicitor or accountant;
- c) Your employer;
- d) Other organisations, who jointly with us, provide products or services to you;



- e) Commercial information service providers, such as credit rating agencies; and
- f) Insurers (or re-insurers).

In collecting your personal information from the above parties other than publicly available sources, we will assume you have given them permission to release your information to us. We are not responsible for the privacy or security practices of the above parties and the parties described above are not covered by this Privacy Policy. Where your personal information is collected from a third party, we will take reasonable steps to ensure you are aware that this has been done.

If you are visiting us through our website, then we collect information about your use of the website. Our website uses cookies to help facilitate your ongoing access to and use of the website. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved by any non-Britannia site.

When you interact with us via our website, the information collected from the use of cookies may include:

- a) The date and time of visits;
- b) Web site page (or pages) viewed;
- c) The site from which you accessed the internet and our website;
- d) How you navigate through the website and interact with pages (including any fields completed in forms and applications completed (where applicable));
- e) Information about your location;
- f) Information about the device used to visit our website; and
- g) IP address (or addresses), and the type of web browser used.

We will not ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Purpose of collection and use of personal information

Any personal information you provide to us will be used to provide information that you request and may also be used to check whether you are eligible for the product or services offered by us. In addition, subject to your approval, your personal information may be retained to provide you with further information about our products and services.



Storage and protection of your personal information

We may electronically record and store personal information which we collect from you. When we do so we will take all reasonable steps to keep it secure, prevent unauthorised disclosure and to keep it accurate and up-to-date.

However, we do not promise that your personal information cannot be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur. If we provide you with any passwords or other security devices it is important that you keep these secret and confidential and do not allow them to be used by any other person. You should notify us immediately if the security of these devices is breached to prevent the unauthorised disclosure of your personal information.

Some information we hold about you will be stored in paper files.

We use a range of physical and electronic security measures to protect the security of the personal information we hold, including that:

- a) Access to information systems is controlled through identity and access management;
- b) Employees are bound by internal information security policies and are required to keep information secure;
- c) Employees are required to complete training about information security and privacy; and
- d) We regularly monitor and review our compliance with internal policies and industry best practice.

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

Disclosure of your personal information

Your personal information may be used by us for the purpose of providing advice and service to you and, may also be used by agencies such as, but not limited to:

- a) The Regulator or service provider when implementing any of our recommendations;
- b) Assessors or by any claims investigators who may need access to such information;
- c) Other professionals such as solicitors, accountants, finance brokers, financial planners, health service providers when such services are required and as requested by you;
- d) Our IT service providers and external compliance assurance service providers;



- e) Providers of external dispute resolution service; and
- f) Government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside the Company where:

- a) We are required or authorised by law or where we have a public duty to do so;
- b) You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- c) We are otherwise permitted to disclose the information under the Privacy Act 1993.

We may transfer personal information outside New Zealand to countries whose privacy laws do not provide the same level of protection as New Zealand's. We may also use overseas facilities or contractors to process or back-up our information or to provide certain services to us. As a result, we may transfer your personal information to our contractors for these purposes.

However, any such transfer of information does not change any of our commitments to safeguard your privacy and the information remains subject to existing confidentiality obligations.

Disclosure of your personal information to third parties

Through our website you may be able to link to other websites which are not under our control. We are not responsible for the privacy or security practices of those third party websites and the sites are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies and we encourage you to read them.

In addition, we have no knowledge of (or control over) the nature, content, and availability of those websites. We do not sponsor, recommend, or endorse anything contained on these linked websites. We do not accept any liability of any description for any loss suffered by you by relying on anything contained or not contained on these linked websites.

None of the information we collect is passed on to any third party without your consent and under no circumstances will we sell or receive payment for disclosing your personal information.

Right to access and correct personal information

The Privacy Act 1993 gives you the right to request access to, and correction of, your personal information. You can do so by contacting us at:



BRITANNIA
Financial Services Ltd

4/106 Bush Road

Albany

Auckland

0632

Or via email at team@opt-ltd.co.nz

When you contact us with such a request, we will take steps to update your personal information, provide you with access to your personal information and/or otherwise address your query within a reasonable period after we receive your request. To protect the security of your personal information, you may be required to provide identification before we update, or provide you with access to your personal information.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access to or to correct your personal information we will let you know our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

What happens if you do not provide us your information

If you do not provide information we have requested, you may be unable to obtain or access our services for which the information is required. Please ask us if you are unsure what information is important and how this might affect you.

Changes to this policy

We review this Privacy Policy periodically to keep it current and may update it at any time on our website. You may also obtain a copy of the latest version by calling us on 0800 500 800.



BRITANNIA
Financial Services Ltd

Privacy policy queries and concerns

If you are concerned about how your personal information is being handled or if you have a complaint about a breach of the New Zealand Privacy Principles by us, please contact us at

4/106 Bush Road
Albany
Auckland
0632

We will acknowledge your complaint within three working days of its receipt. We will let you know if we need any further information from you to investigate your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five working days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are not satisfied with our response to any privacy related concern you may have, you may contact the Privacy Commissioner at:

Office of the Privacy Commissioner

P O Box 10-094
Wellington, New Zealand
Telephone: 04-474 7590 (Wellington)
Telephone: 09-302 8680 (Auckland)
Email: enquiries@privacy.org.nz
Fax: 04- 474 7595
Website: www.privacy.org.nz