# **Privacy Policy**



PACIFIC WEALTH CREATORS LTD www.PacificWealthCreators.com

#### **INTRODUCTION**

Pacific Wealth Creators Ltd (**PWCL**, we, us, our) complies with the New Zealand Privacy Act 1993 (the Act) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

This policy sets out how we will collect, use, disclose and protect your personal information.

This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see <u>www.privacy.org.nz</u>.

### **CHANGES TO THIS POLICY**

We may change this policy from time to time as necessitated by changes to our operation or by new regulation. The new policy will be deemed to take effect upon upload to our website.

#### WHO DO WE COLLECT YOUR PERSONAL INFORMATION FROM

We collect personal information about you from:

- you, when you provide that personal information to us, including via the website and any related service, through any contact with us (e.g. telephone call or email), or when you use our services
- third parties where you have authorised this or the information is publicly available.

We may also collect information about you from publicly available sources of information.

#### WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

Personal information you provide us is held by us, our Custodian and their platform provider for the following purposes:

 to verify your identity as required by the Anti-Money Laundering and Countering Financing of Terrorism Act 2009

- to provide our services to you including administration and managing your money
- to market our services to you, including contacting you by email for this purpose
- to comply with any laws, rules and regulations whether in New Zealand, Australia or in any other country
- for internal research purposes to improve our services to you
- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorised by you or the Act.

#### WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO?

We may disclose your personal information to:

- any business that supports our services and products, including any person that hosts or maintains any underlying IT system, platform or cloud data storage provider that we use to provide the services
- Any third party to support electronic identity verification (if you have signed a PWCL Client Agreement providing authorisation for such checks)
- the Custodian
- Other bodies such as government agencies, regulators, auditors and legal and professional advisers for the purpose of satisfying regulation, legal compliance or to assist with court proceedings
- any other person authorised by you.

A business that supports our services and products may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand.

## PROTECTING YOUR PERSONAL INFORMATION

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

If we believe there has been a breach of your personal information, including unauthorised access or disclosure, then you will be notified to ensure your information is protected by any necessary action you may wish to take.

#### **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email James Clague, Privacy Officer, on privacy@pacificwealthcreators.com or phone +64 7 544 2000. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

#### **INTERNET USE**

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

We do not use Cookies on our website.