

## **Equity Investment Advisers Limited (Equity) Privacy Statement**

Equity Investment Advisers Limited (Equity) is committed to protecting your privacy. This privacy statement outlines how we collect, store, use, and share personal information collected on this site. By submitting your details on this website, you consent to the use of your personal information in accordance with this privacy statement. If you wish to contact us directly you may call one of our offices, phone number is **0800 437 8489**.

### **Use of information**

**Equity only uses your information to contact you or to assess your situation, so we can provide 'fit for purpose' advice and trading services. We do NOT share your information with third parties, other than the following parties: our auditors, when we are we are audited, the trade platform we use (Broker Direct), or parties with the appropriate legal authority to assess client information, such as the FMA, the IRD or the Courts of NZ when this is required.**

### **Email Address**

We will only record your email address if you subscribe to any of our services. It will only be used for the purpose for which you have provided it. We will not use your email address or any of your personal details for any other purpose without your consent and we will not disclose your email address without your consent. Electronic mail submitted to Equity is handled and saved according to the provisions of the New Zealand Privacy Act 2020.

### **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 and prevent unauthorised disclosure.

*However, we cannot promise that your personal information will not 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 confidential and do not allow them to be used by any other person. You should notify us immediately if the security of your password or security device is breached, this will help prevent the unauthorised disclosure of your personal information by allowing us to change your password.*

### **Clickstream Data**

Clickstreams are the paths a user takes when navigating a web page or the internet in general. When you visit our website, our Internet Service Provider may make a record of your visit and logs the following information for statistical purposes - the user's assigned IP address, the user's top level domain name (for example: .co.nz, .gov, .com.au, .uk etc), the

data and time and duration of visit to the site, and the type of browser and operating system used.

## **Cookies**

If you are visiting us through our website, or social media pages, then we *may* collect information about your use and experience on these by using cookies. Cookies are small pieces of information stored on your hard drive or on your mobile browser. 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.

## **Disclaimer**

Our website provides you with general information that is true and accurate to the best of Equity's knowledge. We advise:

**General information only:** The information on our website is general in nature and *is not intended to be regulated financial advice*. You should consult a professional financial adviser before making any financial decisions or taking any action based on the information on our website.

**No liability:** Equity is committed to protecting your privacy. This privacy statement outlines how we collect, store, use, and share personal information collected on this site. By submitting your details on our website, you consent to the use of your personal information in accordance with this privacy statement. If you wish to contact us directly you may call one of our offices, phone numbers are **09 - 304 0145 or 0800 437 8489**.

**Accuracy of information:** Equity has taken all reasonable care to ensure the information on this website is accurate, errors and omissions may occur. We do not accept any responsibility for any inaccuracy, error, or omission in the website's content, or for any loss caused to anyone from relying on that information. We may change, delete, add to, or otherwise amend the information published on this website without notice.

**Historical information:** Any reference on this website to historical information and performance of a product or service may not necessarily be a good guide to future performance. You are solely responsible for any loss caused from relying on such information.

**Third Party websites:** This website may contain links to other websites which are not under our control. Equity has no knowledge of or control over the content, and availability of those websites, or of their privacy practices. We do not sponsor, recommend, or endorse the content of other websites linked to, or referenced from, this website.

**New Zealand law:** The information on this website has been prepared to comply with, and is governed by, New Zealand law. It is only intended for use by persons within New Zealand's legal jurisdiction. Equity does not make any representation that the information on this website complies with the law in any other country.

**Cybersecurity:** Although we regularly update our cybersecurity and virus protection software, we do not guarantee that our website will be free from viruses or other malicious interference (such as spyware, malware, adware, ransomware and worms) that can damage your computer system and access your data.

**Continuous access:** We do our best to keep this website running smoothly. However, we do not guarantee that access to the website will be uninterrupted. We accept no liability for any loss caused by the website being temporarily unavailable either during its planned maintenance or due to technical or other issues beyond our control.

**Copyright and IP:** Unless otherwise indicated, all information on our website is the property of Equity and is protected by copyright and intellectual property laws. Unless stated otherwise, you may access and download the materials located on this website only for personal or agreed upon commercial use. The website may contain several trademarks which are owned by Equity or used with the permission of the registered trademark owner. Before using any material on our website that is identified as being subject to copyright of a third party, you must obtain authorisation to use or reproduce the material from that third party.

Equity does not accept any liability for any loss or damage arising from the use of this website. This does not prejudice your statutory rights.

**Privacy Breach:** We are mandated by NZ law to report privacy breaches and to employ strengthened cross- border protections of personal information.

**The Thirteen Information Privacy Principles (IPPs)** as set out in the of the Privacy Act 2020 determines how we collect or cannot collect-, store-, share-, and dispose of personal information that we deal with. These principles form the basis of the Privacy Act 2020.

These principles are:

IPP1 – the purpose of collection of personal information - we can only collect such information for a lawful purpose, and it must be related to the service/s we are providing, and it must be necessary for service/s.

IPP2 – Source of personal information – we have to collect the information directly from the individual involved, unless such info is publicly available, or the individual has authorised us to collect the information from a third party. Thus, for example if we are offered a contact list, we have to have consent from the individuals that their details may disclosed and for us to use it.

IPP3 – When we collect information from an individual, we must tell that person what will happen to the information and what their rights are. We need to inform them:

- for what purpose we are collecting the information and
- whether we are collecting it under a particular law and we must state which one it is;

- whether we will be disclosing it to anyone else and if so, who.
- whether the person has a choice about giving us their information, and what will happen, if they don't give it to us.
- that they can request to access and correct their personal information, and how they can contact us or any organisation we use to store the information on our behalf.

IPP4 - The manner of collection of personal information – we may not collect personal information unlawfully or in a manner that is unfair or intrusive. When we are collecting information from children or young persons, we have to give this utmost consideration to ensure privacy and minimise the risk of misuse of the information.

IPP5 – Storage and security of personal information – All personal information should be stored safely to protect it against loss or unauthorised access or use. When it is necessary for us to disclose the information to another person related to the provision of our services, we are obligated to do everything reasonably within our power to prevent unauthorised use or disclosure of the information.

IPP6 – Access to personal information – we are obligated to provide you a copy of the information we hold about you should you request this, within 20 working days. This is your right. This information needs to be easily retrievable. However, if it also involves information that impacts national security or for the defence of NZ or where the information is also about someone else, then there may be grounds for refusing you access to such information.

IPP7 – You are entitled to request correction and / or updating of your information. We may ask you to verify the information we have about you so that we can bring it up to date. If we think a correction is not justified, we will record what you asked us to correct or what you thought was wrong then we will record your new information along with the previous information and your reason for requesting this, so that our staff can make correct and informed decisions.

IPP8 – Accuracy, etc, of personal information to be checked before use or disclosure. We may not use your information without taking such steps (if any) as are reasonable to ensure, after considering the purpose for which the information will be used, that the information is accurate, up to date, complete, relevant and not misleading.

IPP9 – An agency is not to keep personal information for longer than necessary – personal information may not be kept for longer than required, to achieve the purpose for which we have collected it or unless the law requires us to keep it, such as the records of the client that are important, so that the company can meet its records information requirements in terms of the companies act, which normally requires a company to hold records for seven years.

IPP10 – Limits on the use of personal information – We may not use your personal information that was provided to us for a specific purpose, to be used for another purpose without your authorisation. There are exceptions, such as where the source of your information is publicly available (e.g. from a telephone book, electoral roll etc.)

IPP11 - Limits of disclosure of personal information – We may not disclose your personal information to other parties unless we have your authorisation. However, some exceptions apply, such as when it is necessary to disclose the information to another entity, when it is directly related to the reason for collecting the information. Otherwise, we keep your information secure. Our staff are informed about the privacy act and know what they may and may not do with your information.

IPP12 - Disclosure of personal information outside of New Zealand – We may not disclose your personal information to other parties that are based offshore, unless:

- the other parties are subject to the NZ Privacy Act 2020, or unless we believe on reasonable grounds that the overseas receipt is subject to privacy laws that are comparable to privacy laws in New Zealand or offer comparable protections.
- a participant in a prescribed country or you or your authorised representative authorises the disclosure after being expressly informed that the recipient may not be required to protect the information in the same way as is required under the new NZ Privacy Act.

IPP13 – Unique identifiers may only be assigned to individuals, if the identifier is necessary to carry out investment functions/purposes. Existing unique identifiers, such as IRD numbers, bank customer numbers, driver’s licence and passport numbers, generally may not be used or assigned to individuals, as a means of identifying individuals like yourself. Any identifiers used must be unique to the specific individual. The identity of individual like you must be clearly established before we assign you an identifier.