

BNZ Investment Services Limited Privacy Policy

Effective 1 May 2024

How and when this privacy policy applies to you

This document sets out our Privacy Policy and is part of our terms and conditions. You can find out more information about our terms and conditions in our Product Disclosure Statements, including the application form.

How this policy works with your product terms and conditions

This privacy policy covers all our products and services and all our interactions with you. These interactions include using our apps and websites and telephone calls with our contact centre, as well as any in-person interactions you have with us, Bank of New Zealand (BNZ) or our agents in connection with your relationship with us.

Our products and services have their own terms and conditions that may include specific privacy terms. If your product or service privacy terms are different from the terms in this policy, the terms in this privacy policy will apply instead.

When this privacy policy applies

This privacy policy applies from 1 May 2024 (the effective date), unless agreed otherwise.

Our privacy policy

1. Who we are
2. How we'll tell you if this privacy policy changes
3. How we collect personal information
4. How we use personal information
5. When we share personal information, and who with
6. How we protect your personal information
7. You have the right to access and correct your personal information
8. How to get in touch with us

Summary

We value your trust and respect your privacy

This document sets out our Privacy Policy for our products and services, and all our interactions with you. We've used examples in this policy to help explain some points – please remember that these examples describe common scenarios but don't cover all situations.

This privacy policy sets out how we collect, use, share and protect your personal information. Personal information includes any information that could identify you - for example:

- your name, personal and tax details, contact details and home address
- information we collect when you use our websites or interact with our agents
- recordings of you from phone calls with us, BNZ or our agents.

Personal information is central to our business

We use it when we:

- design and deliver products and services
- recommend products and services that we think meet your needs
- protect our customers and our business interests
- comply with laws, and with our responsibilities and obligations as a financial services business.

We only use information if we're allowed to – or the law requires it

Whenever we work with personal information, we comply with the laws of New Zealand, including the Privacy Act 2020, and laws of other countries that apply to us. We are allowed to use personal information when:

- you've agreed to let us use it - for example, you've given us your contact information so that we can provide you with information about our products
- we fulfil a contract, and to give you the products or services you've asked for
- we run and develop our business – for example, to understand how customers use our products and services
- we meet our legal obligations – for example, to comply with anti-fraud and anti-money laundering laws.

You have rights to access your personal information

We respect the trust you give us to hold your personal information because we know that your information - and your privacy - are important. For more information on your rights, including how to make a request to access or correct your personal information, read '[You have the right to access and correct your personal information](#)'.

Get in touch if you have questions or complaints

We want to be open, honest, and transparent about how we work with personal information. If you have any questions, please see '[How to get in touch with us](#)'.

Contents

Summary	2
1. Who we are	4
2. How we'll tell you if this privacy policy changes	4
How we'll tell you about changes to this policy	4
3. How we collect personal information	5
When you apply for products or services	5
When you're a customer, use our products or services, or interact with us	5
When we work with third parties or use their information	5
4. How we use personal information	6
When you apply for a product or service	6
When you use any of our products or services	6
When we market products or services to you or provide personalised recommendations	6
When we manage our business	6
When we must comply with our legal obligations	7
5. When we share personal information, and who we share it with	7
When we share information outside BNZ	7
Who we share your information with	7
6. How we protect personal information	9
Where and how we store your personal information	9
How we protect your information	9
What we do if a privacy breach occurs	9
How long we keep your information for	9
7. You have the right to request your personal information	10
You can request information about someone else if you have legal authority	10
You can access or correct certain information online, by phone, or in a BNZ branch	10
Keeping you updated if you make a request	10
8. How to get in touch with us	10
Get in touch if you have a question or complaint about privacy	10
What to do if you're not satisfied with our resolution process	10

1. Who we are

BNZ Investment Services Limited (“BNZISL”) provides wealth products and services.

Our registered address is Jarden House, Level 16, 21 Queen Street, Auckland 1010, New Zealand.

In this document, ‘BNZISL’, ‘we’, ‘us’ or ‘our’ means BNZISL.

‘Our related companies’ means companies that are part of the FirstCape Group. This includes Jarden Wealth & Asset Management Limited, JBWere (New Zealand) Limited and Harbour Asset Management Limited.

‘You’ and ‘your’ means our customers and other people who use or apply for our products and services, or interact with us directly or indirectly through BNZ or another

financial institution. If you give us information about another person, please make sure that you have their permission first. ‘You’ and ‘your’ includes the person:

- whose name was used to set up the customer account
- that uses our products and services
- who gives us personal information.

Any reference in this privacy policy to interactions between you and BNZ mean interactions for the purposes of your relationship with us.

‘Privacy Act’ means the Privacy Act 2020 and any laws that change or replace it.

2. How we’ll tell you if this privacy policy changes

We may update this privacy policy to reflect changes in our products or services, and changes in laws we have to comply with.

We’ll tell you about those changes at least 14 days before the changes come into effect. If we have to make changes to protect the security of your information, or to comply with a change in the law, we can tell you after we’ve made the change.

To keep up to date with how and what we do with your information and your rights, ask for a copy. This

BNZISL Privacy Policy is available on the Harbour Asset Management website or the BNZ website.

How we’ll tell you about changes to this privacy policy

Depending on how significant the changes are, we’ll tell you about changes in one or more of the following ways:

- Putting a notice on the Harbour Asset Management website.
- Sending you an email.

3. How we collect personal information

We collect information when you interact with us, BNZ or our agents. We also collect information from third parties.

Where BNZ collects information from you for use by BNZ in connection with its own products and services, [BNZ’s Master Privacy Policy](#) may also apply to its use of that information.

When you apply for products or services

We collect two types of information when you apply for a product or service.

Information we use to help confirm your identity

- Personal and contact details, and signatures.

- Government issued identifiers or documents such as your driver licence, passport, IRD number, or birth certificate.

- Information that verifies your identity, including RealMe and documents that verify your address.

Information that helps us decide if a product or service is right for you

- Income and expenses, tax details, visa status, and financial history.
- Valuations or information relating to assets – for example, property or KiwiSaver savings.
- Your employment or health.
- Your interactions with us.

When you're a customer, use our products or services, or interact with us

We collect three types of information when you use our products or services.

Information on your payments, transactions and investments

- Information on your investments or managed funds.
- Payment and transaction data including the date, time, amount, frequency, type, location, origin and recipients.

Information on how you use our products or services, or interact with us

- Whether you access our services online, on an app, or in person.
- Whether you use a computer or mobile to connect to our services, and data on how you use our services.
- Any audio recordings of your interactions with us, BNZ or our agents - for example, recordings of voice call with us.
- Information automatically generated during calls to and from us, BNZ or our agents, including transcriptions of call recordings and metadata.
- Information we are required to collect from you to manage any requests you make to us.

Information you give us when you answer questions we ask or when you give us feedback

- Your views on products or services, or information that might help us better understand this.
- Information you give us to confirm or update our records.
- Information you give us when you raise a concern or complaint, or give us feedback about how we are doing.

We aren't responsible for privacy policies on third-party apps and websites.

Sometimes our apps and websites have links to third-party apps and websites. We take care when we choose websites we link to, but we aren't responsible for their content, accuracy, or privacy practices.

When we work with third parties or use their information

We collect personal information about you from BNZ and other third parties, so we can offer you products or services you've applied for and run our business efficiently.

Where BNZ collects information from you for use by BNZ in connection with its own products and services, [BNZ's Master Privacy Policy](#) may also apply to its use of that information.

When you apply for a product or service

- You ask a third party – for example, your bank, or a legal or financial adviser – to give us information.
- You agree that we can ask health service providers or doctors for information about you when you apply for particular products or services (e.g. in relation to KiwiSaver withdrawals for health-related hardship applications).

When we work with third parties to offer you products or services

- We work with third parties to offer you products or services – for example, BNZ, or our related companies.
- They introduce you to us so we can offer you products and services – for example, a bank or other financial services company.
- We work with Inland Revenue and other third parties to deliver superannuation services such as KiwiSaver.

When we work with third parties to help run our businesses

- They give us legal, financial or marketing advice, or advice to help us run our business.
- They help us detect and prevent fraud, scams and other financial crime. For example, the Financial Crime Prevention Network.
- They help us comply with laws. For example, government bodies like Inland Revenue or the police.
- They are publicly available sources - for example, news articles and social media content, and public or government registers.
- They help us or a third party get in touch with you in an emergency.

You can decide not to provide your information, but it will limit what we can do for you

You can choose not to give us some of your personal information. However, if you don't, we may not be able to:

- offer you the products or services that you want
- manage your products or services
- respond to or help with your questions
- confirm your identity or protect you against fraud.

4. How we use personal information

We use your personal information when you apply for our products and services and when you're a customer. We also use this information to manage our business efficiently and develop new products.

When you apply for a product or service

We'll use your personal information to confirm your identity, process your application, and tell you if we can or can't offer you a product or service. We may also use the information to confirm you can act on behalf of another customer.

When you apply for a product or service, we have to decide if it's right for you. We'll use your personal information to:

- decide if you meet the conditions we set for a product or service
- offer you the right products and services to help you achieve your goals.

When you use any of our products or services

When you use our products and services we'll use your personal information to communicate with you about those products and services. We'll keep a record of how we can contact you – for example, by email, phone, or text message.

Personal information helps us do what you ask us to

We use personal information to do the things you expect us to do when you sign up for a product or service. This includes:

- managing our day-to-day business and keeping business records
- making and managing payments
- preparing and sending Annual Member Statements or transaction statements
- working with other companies to deliver or improve our products or services and communications.

We may also use your information to decide when to:

- suggest better ways to use our products and services, or tell you about new features
- tell you about a product or service we think will meet your needs
- inform you when your customer account or investments may require attention or action
- support you when you are experiencing financial difficulty.

When we market products or services to you or provide personalised recommendations

We use your personal information to decide what marketing or personalised information to send you. We may use your information to deliver marketing that is relevant to your interests, or recommendations based on products or services you use.

Marketing messages we send you may include news about products or services we believe will be relevant to you.

You can opt-out of our marketing communications

If you ask us not to send you any email marketing materials or research surveys, we'll make that change in our systems as soon as we can. You can opt out of our email marketing communications by:

- clicking the 'unsubscribe' links when you get marketing emails
- calling our contact centre on 0800 275 269

If you do opt out, we still have to send you operational communications. These may include messages that:

- are about your products or services – for example, if an investment term is about to come to an end
- we have to send to comply with New Zealand laws. For example, if you are a default BNZ KiwiSaver Scheme member, or any other member in our BNZ KiwiSaver Scheme Default Fund, we will contact you at certain stages of your life (such as when you are approaching 65 years of age) to encourage you to think about whether the Default Fund remains appropriate for your personal circumstances.

When we manage our business

We use your information to run our day-to-day operations.

Personal information helps us run our business efficiently

We use personal information to do the kind of things most companies do, for example, preparing management reports and business plans.

We also do things that financial services companies need to do, for example:

- managing financial and other risks for our business and our customers
- planning, building and monitoring systems and processes for investing money.

Personal information helps us improve our offers and our customer service

We constantly look for ways to improve our products or services, and our standard of customer service. We use personal information to help us:

- find ways to improve customer service – for example, we may use recorded calls for staff training and quality improvement
- add new features to or improve our products or services, and develop new products or services
- resolve any queries you may have about your interactions with us, including complaints
- make sure we can correct any errors in the services you have received, such as contacting you to arrange refunds
- come up with ideas on ways to help people manage their money.

When we must comply with our legal obligations

We have to comply with several New Zealand laws and some overseas laws. We may have to use personal information to comply with our obligations:

- to agencies that prevent or investigate unlawful activities like fraud, money laundering or other illegal activities
- to regulatory or government bodies like Inland Revenue and the Police
- under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009.

5. When we share personal information, and who we share it with

We share information with our related companies, BNZ and other third parties. We only share personal information when we're allowed to under New Zealand or international laws, or when we're legally required to.

When we share information outside BNZISL

We share personal information with third parties who aren't our related companies when:

- we need to in order to operate, administer or manage your investment in our product, or to comply with our legal obligations. For example, if you are a BNZ KiwiSaver Scheme member and wish to make a serious illness withdrawal ahead of you reaching 65 years of age, we will need to share the information you supply in support of that application to the Supervisor of the BNZ KiwiSaver Scheme (The New Zealand Guardian Trust Company Limited), because it is the Supervisor who makes the decision on whether to allow your application or not
- we develop or update our systems and make changes to our products or services
- we need to comply with our legal obligations in New Zealand or overseas
- we need to participate in resolving a dispute with you - for example, responding to complaints made to Financial Services Complaints Limited (Our approved dispute resolution scheme)
- we need to protect our business interests – for example, to help us detect or prevent fraud, scams, and other unlawful activity, and to manage our risk.

Who we share your information with

We share personal information with:

- our related companies
- BNZ
- companies we work with to offer products or services
- companies who help us deliver and manage our products or services
- government, dispute resolution, and regulatory bodies
- companies, individuals, and service providers you've given us permission to share information with.

Some of the organisations we share information with may be overseas. These organisations may have to comply with laws that require them to disclose your personal information.

We share information with our related companies

We share and combine personal information that we hold with our related companies to get a better picture of your needs, to run our business, meet our obligations, and deliver products or services that require collaboration between our specialist entities.

We share information with BNZ

We share personal information with BNZ:

- where it provides a service to us that requires it to process or store personal information about you on our behalf
- where you have asked us to do so, for example to complete transactions or to enable BNZ to provide products or services to you.

We share information with third parties we work with to offer products or services

We share personal information with companies we work with to offer our products or services to their customers. We also share information with companies we agree can offer their products and services to our customers.

We share information with third parties who help us deliver products or services

We share personal information with a range of third parties who help us deliver and manage our products or services. These third parties include:

- BNZ
- organisations providing financial advice services
- registry agents, such as Apex
- accountants, auditors, and lawyers
- companies and individuals who help us develop new products or services
- agencies and institutions that help us manage our risk or prevent and identify fraudulent activity, for example through industry risk-sharing agreements
- organisations we may assign or transfer our rights or obligations to.

We share information with government, dispute resolution, and regulatory bodies

We share information with government and regulatory bodies for two reasons:

- The law requires us to tell them - for example, when a customer gives us fraudulent information, or commits - or tries to commit - an offence.
- The law requires us to share information with authorities like Inland Revenue, the Financial Markets Authority, the Commerce Commission, or the Office of the Privacy Commissioner. These authorities may share this information with other parties.

We also share information with dispute resolution bodies when asked to respond to any complaints they receive from our customers.

We share information with companies, individuals, and service providers when you've given us permission.

6. How we protect personal information

Your privacy is important to us. We take protecting your personal information seriously.

Where and how we store your personal information

We store most of our personal information in New Zealand or in Australia.

We store personal information electronically and physically. We store electronic information in facilities in New Zealand and overseas:

- that we manage
- that are managed by third parties, including cloud storage.

How we protect your information

We comply with New Zealand and international laws that set out how to protect both BNZISL and customer information.

- We protect your information in a range of ways.
- We use cybersecurity specialists that look after and protect your information. This team helps prevent, detect and respond to cybersecurity events and incidents.

How we protect your information when we transfer it outside BNZ

When we transfer your information outside BNZISL it may be to a company in New Zealand or overseas. Our contract with the company will require the company to protect your personal information.

We'll use reasonable security safeguards, like file encryption, to protect your personal information.

What we do if a privacy breach occurs

If we believe that a privacy breach has occurred, we'll identify the issue and take steps to minimise any harm.

If we believe the breach has caused, or is likely to cause serious harm, we'll contact the Office of the Privacy Commissioner. We may also contact customers who may be affected by the breach.

If you believe a privacy breach has occurred, please contact us as soon as possible.

How long we keep your information for

We're required to hold personal information by the Companies Act 1993, the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, the Financial Transactions Reporting Act 1996, and other New Zealand and international laws.

We usually have to hold personal information for at least seven years. But we keep certain types of information for longer, even if you're no longer a customer, for example, advice records in relation to KiwiSaver products.

7. You have the right to access and correct your personal information

You, or someone you give authority to, has the right to request access to or correct your personal information.

You can request information about someone else if you have legal authority

You can request to access or correct someone else's information if you have legal authority – for example, if you have a power of attorney.

You can access or correct certain information online, by phone, or in a BNZ branch

In most cases you can access or correct your information yourself and you won't need to submit a request. The fastest way for you to access or correct your everyday information is to use BNZ internet banking. Or you can call us, or go into a BNZ branch, and we'll do it for you.

Everyday requests for information are things like:

- balances and transaction history, statements, and KiwiSaver information
- view or confirm product details like fees and fund allocation

- updates to personal information like an email, postal address, or phone number.

If the information you want is not available using everyday channels, for example, the information is unusual, complex or sensitive, you may need to make a request for your personal information so we can gather it for you.

[Find out how to make a request to access or correct your personal information](#)

If you don't have internet access, or you want to talk to us about how to access or correct your information, call BNZ on 0800 275 269.

Keeping you updated if you make a request

We'll normally get back to you with a response within 20 working days. We may take longer in certain situations. We will keep you up to date throughout the process.

Please tell us if your request is urgent, and why, and we'll take this into account.

We don't normally charge a fee to complete personal information requests. If we are going to charge a fee, we'll talk to you before we go ahead.

8. How to get in touch with us

We care about your privacy and welcome your feedback.

Get in touch if you have a question or complaint about privacy

Our Privacy Officer monitors how we comply with privacy laws.

If you have any questions, feel that your privacy has been compromised in any way, or want to make a complaint, please contact the Privacy Officer:

- by email, at harbourcompliance@harbourasset.co.nz
- by letter to:
BNZISL Privacy Officer
Jarden House
Level 16
21 Queen Street
Auckland 1010

What to do if you're not satisfied with our resolution process

If you've been through our complaints and resolution process but aren't satisfied, you can contact the Officer of the Privacy Commissioner:

Online: privacy.org.nz

Phone: 0800 803 909

(From overseas) +64 (0)4 474 7590

Email: enquiries@privacy.org.nz

