



Privacy Statement

November 2020



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1. Policy Statement

As part of our commitment to customer service, Craigs Investment Partners Limited (CIP) is committed to protecting your privacy. This Privacy Statement is designed to inform you about CIPs approach to the handling of personal information, consistent with the Privacy Act 2020 and the Information Privacy Principles.

This Privacy Statement applies to Craigs investment Partners Limited and its wholly owned subsidiaries ("CIP", "we", "us", or "our").

It is aimed at assisting you to understand:

- the types of information we collect and hold
- the purposes for which we collect, hold, use and disclose personal information
- how we protect and handle the personal information that we collect when providing you with a financial service or product or after your financial service or product is terminated
- how you may access the personal information that we hold about you and seek the correction of that information
- how you may complain if you are not satisfied with the way in which we handle your personal information and how we will deal with complaints
- when and how we may disclose personal information to recipients in New Zealand and overseas and in which countries they are likely to be located.

2. Collection of Personal Information

What information do we collect?

CIP collects personal information about you which is reasonably necessary for us to administer our relationship with you including to:

- provide you with financial products or services
- consider applications or approaches you make to us
- maintain your contact details
- fulfil our legal obligations such as those that arise under taxation and anti-money laundering and counter-terrorism laws and regulations.

Personal information about you is usually collected from you by your adviser, during face to face meetings, telephone discussions or email communications. We may also collect your personal information if you fill in an application form, apply for a financial product or use our website. If we do not collect your personal information then we may not be able to deal with you or to provide you with our financial services.

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The types of personal information we generally collect and hold relate to:

- your name, contact details and identification information, including those issued by government agencies such as a driver licence number or tax identification number
- your financial position and investment objectives and the financial products and services we have provided to you
- your employment details and occupation
- your interactions with us.

Sensitive information

We will not generally collect sensitive information about you unless you provide your consent or we are required to do so by law. Sensitive information includes information relating to your health, race, political or religious beliefs, sexual preferences, criminal convictions or your membership of professional or trade associations or unions.

You may decide not to provide your personal information to us. However, if you do not provide it, you may not be able to fully utilise all of our products and services.

3. Collecting information from Third Parties

We may collect personal information about you from publicly available sources, such as the electoral roll or the internet.

We may also collect personal information from third parties, such as:

- credit reporting bodies if we require information about your credit history
- organisations with which we have arrangements to jointly offer products or to share information for marketing purposes
- other financial service providers who may have introduced you to us
- agencies that provide electronic identification verification services.

4. Cookies

We may collect information from how you use our website to help us to better tailor our services to you. For example, we may do this when you click on a link from our website or visit a website which displays an advertisement for CIP. Usually this information is derived from cookies which do not identify you. However, if you log into our secure client portal or access our website from a personalised communication from us, we may be able to identify you.

You may configure your web browser to accept or reject cookies, or identify when cookies are being sent. However, if you disable the use of cookies or remove or reject specific cookies from our website you may not be able to gain access to all of the content on our website.

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5. Tax residency status

CIP may be required to ask you about your tax residency status under taxation information sharing agreements or treaties the New Zealand Government has in place with other countries. The relevant treaty or law may require us to collect your foreign tax identification number or to provide other personal information about you to overseas regulators or authorities.

6. How do we use your information?

We may use and disclose your personal information in order to administer our relationship with you including to:

- provide you with financial products, services or advice
- implement your instructions or manage your investments
- administer your accounts and perform other administrative tasks including reporting on your investments, risk management, systems development and testing, staff training, collecting debts and conducting market research
- keep you up to date on the products and services that we offer
- consider any concerns or complaints you may raise with us
- prevent or investigate any actual or suspected unlawful activity
- comply with any relevant laws or regulations.

When you appoint us to provide you with services your personal information will be collected and used in accordance with our Terms and Conditions and Disclosure of Money and Property Handling Procedures and this Privacy Statement. If you provide us with electronic contact details, you agree that we may send you commercial electronic messages (e.g. texts and emails) for any of the purposes set out in this Privacy Statement.

7. Disclosure of your personal information

We do not sell personal information to other organisations. However, from time to time, we may share your personal information with other entities within CIP. We may also provide your personal information to third parties such as:

- any third party service providers or related parties of CIP who assist us to provide, manage or administer our products or services such as custodians, auditors, fund managers, insurers, external dispute resolution providers or mail houses
- companies and individuals and other legal entities you've given us permission to share information with
- any financial or investment adviser that you nominate or who refers you to us
- your employer if your superannuation is invested in an employer sponsored corporate

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superannuation fund

- any financial institution who holds an account for you
- underwriters, corporate advisers, or issue managers where you are applying for financial products in an initial public offering or secondary capital raising
- our regulators.

We may also occasionally disclose your personal information where it is authorised or required by law, where it is necessary to discharge our regulatory obligations or to assist in law enforcement.

8. Disclosing your personal information overseas

From time to time, we may need to disclose your personal information to organisations including related parties of CIP located overseas, typically custodians who may hold non-New Zealand assets such as international equities on our behalf for you in jurisdictions such as the UK, US and Singapore.

If we disclose your personal information overseas, we will take steps to ensure that your personal information is treated in accordance with New Zealand standards.

9. Managing your personal information

CIP will take all reasonable steps to protect your personal information from misuse and loss and will ensure that your personal information can only be accessed by people properly authorised to have access.

We may store your personal information in hard copy documents or electronically. We maintain physical security, such as locks and security systems, over our premises. We also use technology to maintain the security of our computer network and employ firewalls and other security measures such as passwords to control access to our computer systems. Where we store your personal information on computer servers maintained by third parties we ensure that those third parties use technology to keep your information secure.

10. How to protect your privacy

There are inherent risks in transmitting information through the internet. You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change. We require you to:

- keep your passwords and user names confidential and secure at all times
- take reasonable steps to ensure that the computer, mobile device or email account that you use to interact with us stay secure such as by using anti-virus/malware software on personal devices and avoiding the use of public computing facilities (internet cafés)
- not share your passwords or user names with any third party and to change them regularly
- let us know immediately if you believe your security measures have been compromised.

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11. How long do we hold your information

We are required by law to retain certain types of information for varying lengths of time. Depending on the particular circumstances, we may be required to retain business records which include your personal information from a period of 7 years to indefinitely. Where we are not required to retain your personal information by law or to administer our relationship with you, we will take reasonable steps to permanently destroy or de-identify your personal information including information held by service providers (e.g. data hosting providers) when it is no longer required for the purpose for which it was collected.

If you have subscribed to one of our newsletters, the details you provide may be stored by us and in a secure third party database by our service providers. Your details will be removed from the database when you unsubscribe to our newsletter.

12. Accessing your information

You have certain rights of access to and correction of your personal information under the Privacy Act. You can contact us as set out below to request access to your information. However there may be a cost associated with accessing that information. Ordinarily, we will give you full access to your information and will provide you with a reason if your request for access is denied. Please note that in exceptional circumstances there may be some legal, administrative or other reason to deny access and we may not be able to inform you of the reason.

13. Correcting your information

If you believe that the personal information that we hold is inaccurate, incomplete or out-of-date, you should contact us. We will promptly update any personal information that we hold which is inaccurate, incomplete or out-of-date. If we do not agree to update your information, we will provide you with our reasons. We will also tell you what you can do if you are not satisfied with our response.

14. Complaints Procedure

If you believe that your privacy has been compromised or have a concern, you may contact the Privacy Officer as follows:

Email: compliance@craigsip.com

Mail: Privacy Officer

Craigs Investment Partners Limited

PO Box 13155

Tauranga 3141

New Zealand.

CIPs Privacy Officer will, in good faith, try to resolve the dispute.

If your concern is not satisfactorily resolved, you may be eligible to refer the complaint to Financial Services Complaints Ltd (FSCL)

PO Box 5967

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Lambton Quay
Wellington 6145
Telephone +64 (4) 472 3725 or Call Free on 0800 347257
Email address: complaints@fscl.org.nz

Or to the Privacy Commissioner
Office of the Privacy Commissioner
PO Box 10 094
The Terrace
Wellington 6143
Telephone 0800 803 909
Email: enquiries@privacy.org.nz

15. Amendments

We reserve the right to modify sections of this Privacy Statement at any time. Please check this Privacy Statement from time to time for any changes.