

NZBritannia Group's business

The NZBritannia Group (the "Group") comprises Britannia Financial Services Limited, Britannia Nominees Limited and Britannia Financial Planning Limited.

The Group's core business is:

- a) Administering and managing its managed investment schemes in line with scheme rules and members requirements.
- b) Manufacture and distribution of financial products by the Group in a manner that ensures good customer outcomes.
- c) Assisting with and effecting the transfer of clients' UK pensions and other monies to the Britannia Retirement Scheme.
- d) Providing financial advice.

Underpinning this policy is the Group's Code of Conduct policy (the "Code") which establishes that the Group expects all directors, employees, contractors and consultants who work for the Group to act in accordance with relevant legislation and regulation and abide by applicable Company policies. The Code articulates the Group's fundamental principles, values, and framework for action within the organisation.

Our clients are the focus of our services. We believe clients' concerns and complaints are one of the most important ways of understanding, and learning, what we need to do to keep improving and getting better at what we do. We are committed to achieving high standards in every area of our work and to continuous improvement.

The respective Boards of Directors of Group companies expect that members of the Group must, at all times, comply with all the obligations under the applicable legislation and regulation and meet good conduct standards.

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 managed investment schemes and any users of our website or social media pages (Facebook) how we comply with the requirements of the New Zealand Privacy Act 2020 ("Privacy Act") and the General Data Protection Regulation for residents of the European Union, in managing personal information.

Sometimes we update our Privacy Policy, and you can always find the most up-to-date version on our website. If you have any concerns about any updates or queries about how we operate this Privacy Policy, please contact us on 0800 500 811.

Collection of personal information

Personal Information is defined in the Privacy Act 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.



Types of personal information we collect.

The types of personal information we collect will vary depending on the nature of your dealings with us. We only collect personal information that is necessary. Where reasonable and practicable, we will collect your personal information directly from you.

We can collect personal information directly from you - for example:

- a) Over the telephone or video call (such as Skype or Zoom) e.g., when you contact our staff.
- b) Through one of our digital platforms like our website or social media pages or similar.
- c) When you write or email to us.
- d) When you subscribe to receive our newsletter or updates, as well as content preferences to help us identify which material you want to receive.
- e) When you participate in a marketing campaign or promotion (or a similar event) administered by us or our representatives.
- f) As part of a financial advice process.

Generally, the types of personal information we collect, and hold includes:

- a) Your name.
- b) Your date of birth.
- c) Your contact details (such as email, postal and physical addresses and phone numbers).
- d) Bank account details.
- e) Billing information.
- f) Tax number (IRD) and overseas tax numbers (ITNs).
- g) Details relating to your use of any product and/or service offered by us.
- h) Details of your enquiry.
- i) Details of any other preferences you tell us about (such as subscription preferences).
- j) Personal information required to assist us in providing you with financial advice.

We may also collect your personal information from:

- a) Publicly available sources e.g., via the internet.
- b) Your professional advisers e.g., other financial advisers, solicitors or accountants.
- c) The administrators of investment and/or pension schemes where you hold or have previously held investments.
- d) Other organisations (e.g., UK schemes), who provide products or services to you.

We collect your personal information from the above parties other than publicly available sources where we have received your express consent to do so. 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.

Online device information and cookies

If you are visiting us through our website or social media pages, then we collect information about your use and experience 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.

Cookies cannot be used to spread viruses and they cannot access your hard drive. The cookies we send to your devices cannot 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-NZBritannia website or social media pages.

When you interact with us via our website or social media pages the information collected from the use of cookies may include:



- a) The date and time of visits.
- b) Website page(s) viewed.
- c) The website from which you accessed the internet and our website or other digital platform.
- 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.
- g) IP address (or addresses) and the type of web browser used.

We will not ask you to supply personal information publicly over any website or social media 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 but we would require your express consent prior to us including you in such activities.

Bots

A bot (short for “robot”) is a piece of software that is programmed to do certain tasks, such as responding to certain phrases with programmed responses. A bot acts in accordance with its instructions, imitating a human user’s behaviours, but without a human behind it. When you talk to a bot from a third-party platform such as Facebook Messenger or Google they will temporarily store and analyse your conversation so that the bot can talk back to you.

Third party platform providers, such as Facebook Messenger, may also store your bot conversation.

Purpose of collection and use of personal information.

Any personal information you provide to us may be used to:

- a) check whether you are eligible for the product or services offered by us;
- b) assist in facilitating the services we offer – namely investing, transferring and ongoing management of your investment(s) and providing financial advice, if applicable;
- c) provide information that you request;
- d) provide you with further information about our products and services; and/or
- e) provide information to you that we consider may be useful and relevant to the services we are providing you.

We also have an obligation to maintain personal information to disclose to regulatory and similar bodies. See “Disclosure of your personal information” below. These bodies have a legal right to such information.

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 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 devices is breached to prevent the unauthorised disclosure of your personal information.

Some information we hold about you will be stored in paper files but most of your information will be stored electronically on physical hard drives and/or in the cloud, by cloud service providers – see “Cloud-based service providers” below.

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

- Access to information systems is controlled through identity and access management.
- Our buildings are secured with a combination of locks and monitored alarms to prevent unauthorised access.
- Employees are bound by internal information security policies and are required to keep information secure.
- Employees are required to complete training about information security and privacy.
- When we send information overseas or use service providers to process or store information, we put arrangements in place to protect your information.
- We regularly monitor and review our compliance (and our service providers’ compliance) with internal policies and industry best practice.
- We only keep information for as long as we need it, or as long as the law requires us to. We have a records management policy that governs how we manage our information and records to make sure we destroy any information that is outdated, irrelevant or unnecessary.

Cloud-based service providers

We and our third-party service providers store and process information we collect on local and cloud servers both in New Zealand and overseas. We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

Timeframes for keeping personal information.

We take reasonable steps to destroy or permanently anonymise any personal information as soon as practicable after the date of which it has no legal or regulatory purpose or where we have no legitimate business purpose with it.

In the case of information that relates to our products we have provided; we are required by law to hold some of this information for up to ten years. After such time, provided that the personal information is no longer relevant to any service we are providing you, we will take reasonable steps to safely destroy or anonymise any personal information.

If there is a privacy breach (also known as a ‘data breach’)

A privacy breach is where there has been unauthorised or accidental access to personal information, or disclosure, alteration, loss, or destruction of personal information. It can also include a situation where a business or organisation is stopped from accessing information – either on a temporary or permanent basis.

We work hard to keep your personal information safe. However, despite applying strict security measures and following industry standards to protect your personal information, there is still a possibility that our security could be breached.

If we experience a privacy breach, where there is a loss or unauthorised access or disclosure of your personal information that is likely to cause you serious harm, we will, as soon as we become aware of the breach:



- Seek to quickly identify and secure the breach to prevent any further breaches and reduce the harm caused.
- Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals.
- Advise and involve the appropriate authorities where criminal activity is suspected.
- Where appropriate, notify any individuals who are affected by the breach (where possible, directly).
- Where appropriate, put a notice on our website advising our clients of the breach; and
- Notify the Privacy Commissioner.

Disclosure of your personal information

We may disclose your personal information to others outside NZBritannia where:

- It is necessary to achieve the purpose that we collected the information for.
- We are required or authorised by law or where we have a public duty to do so.
- You have expressly consented to the disclosure, or the consent may be reasonably inferred from the circumstances; or
- We are permitted to disclose the information under the Privacy Act 2020.
- We are required to comply with our legal and regulatory obligations including Anti Money Laundering/Counter Financing of Terrorism compliance and audit and reporting requirements.
- It is necessary to defend or enforce our rights: such as to collect money owed to us.

Parties we may disclose your information to

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:

- Any outsourced service provider who assists in delivery of the services we carry out, such as our registry services and scheme administration providers, our IT consultants and IT platform or portal providers, our custodians, our supervisor (if applicable), member communication specialists/providers etc. in line with the purpose/s for collecting such information.
- Auditors and external compliance reviewers.
- Our external dispute resolution service.
- Regulatory agencies.
- Inland Revenue.
- Your financial, legal, accounting, tax or other advisers

If we don't need to share your information with a third party in order to provide advice, products or services to you, we will not pass on your information to them without your consent. Under no circumstances will we sell or receive payment for disclosing your personal information.

Sending your information overseas

We may transfer personal information outside New Zealand, including to overseas members of NZBritannia's related companies and overseas service providers or other third parties who process or store our information, or provide certain services to us (e.g., HMRC).



Where we do this, it does not change any of our commitments to you to safeguard your privacy. We make sure that appropriate security and information handling arrangements are in place and the information remains subject to confidentiality obligations.

Third party websites

Through our website or social media pages, 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, correct and delete personal information.

You have the right to request access to, correct and, in some circumstances, delete your personal information. You can do so by contacting us at:

NZBritannia

PO Box 302369

North Harbour

Auckland 0751

Phone: 0800 500 811

Email: team@nzbritannia.co.nz

When you contact us with such a request, we will take steps to update or delete 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.

We are only able to delete your data to the extent that it is not required to be held by us to satisfy any legal, regulatory or similar requirement(s).

There is no fee for requesting that your personal information is corrected or deleted or for us to make corrections or deletions. 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 or delete 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 or delete 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, correct or delete 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 products and 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 Privacy Policy

We review this Privacy Policy periodically to keep it current and available on our website. If the changes are significant, we may advise you directly. You may also obtain a copy of the latest version by calling us on 0800 500 811.

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:

NZBritannia

PO Box 302369

North Harbour

Auckland 0751

Phone: 0800 500 811

Email: team@nzbritannia.co.nz

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

PO Box 10-094

The Terrace

Wellington 6143

New Zealand

Phone: 0800 803 909 (Monday to Friday, 10:00am to 3:00pm)

Fax: 04 474 7595

Email: enquiries@privacy.org.nz

Website: privacy.org.nz

