The website hosted at www.pauawealth.com (the "Website") is owned and operated by Pāua Wealth Management Limited ("we" or "us"). We advise you to read this Privacy Policy carefully before using the Website.

Privacy Policy

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 and any users of our digital platforms (i.e. our website and related social media pages) about how we comply with the requirements of the New Zealand Privacy Act 2020 ("the Privacy Act") in managing personal information.

Consent to Privacy Policy

Please note that when you contact us through our website and related social media pages, you are agreeing to this Privacy Policy. If you do not agree with this Privacy Policy, please do not contact us through any of our digital platforms, but call us on 0800 728 296.

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 Pāua Wealth Management Limited or other legal entity).

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 and inform you that we are collecting it.

We mainly collect personal information directly from you, for example:

- To populate the establishment of a client account;
- Over the telephone or a video call (such as over Microsoft Teams, Zoom or Skype) e.g. when you contact our employee;
- Through one of our digital platforms like our website and related social media pages;
- When you email or write to us; or
- When you participate in an event administered by us or our representatives or partners.

If it is not obvious that we are collecting personal information from you, we will do our best to make it clear to you so that you are always aware when information is being collected.

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

- Name
- Date of birth
- Contact details (such as your email address, postal address, phone number)

- Details relating to your use of any product and/or service offered by us
- Information about your personal and financial circumstances, so we can assess your needs
- Details of your enquiry
- Details of any preferences you tell us about (such as subscription preferences).

We may also collect personal information about you from:

- Publicly available sources e.g. via the internet;
- Your professional advisers e.g. lawyers, accountants and other service providers

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 and related social media pages, then we 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.

The cookies we send to your computer, mobile phone or other device cannot read your hard drive, obtain any information from your browser or command your device to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Pāua Wealth Management Limited website.

When you interact with us through our website and related social media pages, the information collected through the cookies may include:

- The date and time of visits;
- Website page (or pages) viewed;
- The website from which you accessed the internet and our website or other digital platform;
- How you navigate through the website and interact with pages (including any fields completed in forms and applications completed (where applicable));
- Information about your location;
- Information about the device used to visit our digital platform; and
- IP address (or addresses), and the type of web browser used.

Purpose of collection and use of personal information

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

- Check whether you are eligible for the product or services offered by us;
- Provide information that you request;
- Provide you with further information about our other products and services;

- To verify your identity
- To provide services to you
- To promote our services to you, including contacting you electronically (e.g. by text or email for this purpose)
- To improve the services that we provide to you
- To undertake credit checks of you (if necessary)
- To respond to communications from you, including a complaint
- To protect and/or enforce our legal rights and interests, including defending any claim
- For any other purpose authorised by you or the Privacy Act 2020.

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 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.

Some information we hold about you will be temporarily stored in paper files, but most of your information will be stored electronically on physical hard drives [and/or] on 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 secure;
- 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 use third party service providers to store and process most of the information we collect.

- For non-financial business records Microsoft 365 cloud-based servers located in Australia are used.
- For business financial records Amazon Web Services with cloud-based servers are located in the U.S. Data is stored in compliance with EU based data protections laws (under their GDPR).

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.

Non-cloud-based service providers

We use third party service provider s to store and process most of the information we collect.

- For website visitors a SQL local database webserver in New Zealand is used.
- For client records data is stored in data centres located in locations in Sydney Australia and Singapore.

Timeframes for keeping personal information

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

In the case of information that relates to our advice services or products or services we have provided, we are required by law to hold this information for seven years. After this 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 de-identify any personal information. We have a records management policy that governs how we manage our information and records to enable us to destroy any information that is outdated, irrelevant or no longer necessary.

If there is a privacy breach

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 Pāua Wealth Management Limited where:

- It is necessary to enable us 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 your consent can be reasonably inferred from the circumstances; or
- We are permitted to disclose the information under the Privacy Act 2020.

Parties we may disclose your information to

Your personal information may be used by us for the purpose of providing advice and services to you and may also be used by agencies such as, but not limited to:

- Any out-sourced service provider who assists in the services we are required to carry out such as auditors and external compliance reviewers;
- Our external dispute resolution service;
- Regulators;
- Credit reporting and debt collecting organisations;
- Any Pāua Wealth Management Limited's related companies where there is a need to do so;
- Any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products;
- A credit reference agency for the purpose of credit checking you;
- Other third parties (for anonymised statistical information);
- A person who can require us to supply your personal information (e.g. a regulatory authority);
- Any other person authorised by the Privacy Act 2020 or another law (e.g. a law enforcement agency);
- Any other person authorised by you; or
- A business that supports our services and products, which may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand.

If we don't need to share your information with a third party in order to provide advice and 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 send your personal information outside New Zealand, including to overseas members of Pāua Wealth Management Limited's related companies and overseas service providers or other third parties who process or store our information, or provide certain services to us.

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.

All countries have different privacy laws and information protection standards. If we need to send your personal information to a country that has lower standards of information protection than in New Zealand, we will take appropriate measures to protect your personal information. Where it is not possible to ensure that appropriate security and information handling arrangements are in place, we will let you know and gain your consent prior to sending your personal information overseas.

Third party websites

Through our website or our 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.

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 on 0800 728 296, or email us at privacyofficer@pauawealth.com.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).

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 personal information to the extent that it is not required to be held by us to satisfy any legal, regulatory, or similar requirements.

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 or to correct or delete your personal information, we will let you know our reasons, except if the law prevents us from doing 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 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 728 296.

Privacy Policy queries and concerns

If you are concerned about how your personal information is being handled or if you feel that we have compromised your privacy in some way, please contact us on 0800 728 296 , or email us privacyofficer@pauawealth.com.

We will acknowledge your complaint within two 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 privacy related 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 lodge a complaint on the Privacy Office website (www.privacy.org.nz) or send a complaint form to the Privacy Commissioner at:

Office of the Privacy Commissioner
P O Box 10-094
Wellington 6143, New Zealand
Fax: 04 474 7595
Email: enquiries@privacy.org.nz

Telephone: 0800 803 909
Website: www.privacy.org.nz