

## PRIVACY POLICY

At Penberthy Insurance Limited, we are committed to protecting your privacy in accordance with the Privacy Act 2020 (Privacy Act) and the New Zealand Information Privacy Principles (NZIPPs).

This Privacy Notice outlines how we collect, disclose, and handle your personal information as defined in the Act.

### WHY DO WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information so we can:

- identify you and conduct necessary checks (including where required by the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and other legislation).
- determine what services or products we can provide to you e.g. our insurance broking services, financial advice services, funding services, claims management services, risk management and other consulting services;
- issue, manage and administer services and products provided to you or others, including claims investigation, handling and settlement;
- improve our services and products e.g. training and development of our representatives, product and service research and data analysis and business strategy development; and
- provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events which we consider may be of interest to you).

### WHAT IF YOU DO NOT PROVIDE SOME PERSONAL INFORMATION TO US?

If the required personal information is not provided, we or any involved third parties may not be able to provide appropriate services or products. If you do not provide the required personal information, we will explain what the impact will be.

### HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Collection can take place by telephone, email, or in writing and through websites (from data you input directly or through cookies and other web analytic tools).

Unless it is unreasonable or impracticable for us to do so, we will collect your information directly from you or your agents.

We may obtain personal information indirectly and who it is from can depend on the circumstances. We will usually obtain it from another insured if they arrange a policy which also covers you, related bodies corporate, referrals, your previous insurers or insurance broker/adviser, witnesses in relation to claims, health care workers, publicly available sources, premium funders and persons who we enter into business alliances with.

If you provide us with personal information about another person you must only do so with their consent and agree to make them aware of this privacy notice.

## **WHO WE DISCLOSE YOUR PERSONAL INFORMATION TO?**

We share your personal information with third parties for the collection purposes noted above where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

We do not use or disclose personal information for any purpose that is unrelated to our services and that you would not reasonably expect (except with your consent). We will only use your personal information for the purposes for which it was collected or as consented to.

We usually disclose personal information to third parties who assist us or are involved in the provision of our services and your personal information is disclosed to them only in connection with the services we provide to you or with your consent. We may also disclose it for direct marketing purposes.

These third parties can include our related companies, our agents or contractors, insurers, their agents, regulators such as FMA and others they rely on to provide their services and products (e.g. reinsurers), premium funders, other insurance broker/advisers, insurance reference bureaus, loss adjusters or assessors, medical service providers, credit agencies, lawyers and accountants, prospective purchasers of our business and our alliance and other business partners.

These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them and we take such steps as are reasonable to ensure that they are aware of the provisions of our Privacy Statement in relation to your personal information.

We also use personal information to develop, identify and offer products and services that may interest you, conduct market or customer satisfaction research. From time to time we may seek to develop arrangements with other organisations that may be of benefit to you in relation to promotion, administration and use of our respective products and services.

Any personal information provided to us may be transferred to, and stored at, a destination outside New Zealand, including but not limited to Australia, United Kingdom, and the United States of America. If we need to provide your personal information to a country that does not offer similar privacy protections, we will fully inform you and seek your express consent to do so, prior to sharing your personal information.

## **HOW DO WE MANAGE THE SECURITY OF YOUR PERSONAL INFORMATION**

We take reasonable steps to ensure that your personal information is safe. We retain personal information electronically with us or our appointed data storage provider(s). You will appreciate, however, that we cannot guarantee the security of all transmissions of personal information, especially where the internet is involved.

Notwithstanding the above, we endeavour to take all reasonable steps to:

- protect any personal information that we hold from misuse, interference and loss, and to protect it from unauthorised access, modification or disclosure both physically and through computer security measures;
- destroy or permanently de-identify personal information in accordance with the Privacy Act.

We maintain computer and network security; for example, we use firewalls, anti-virus & anti-spam (security measures for the internet) and other security systems such as user identifiers and passwords to control access to computer systems.

## HOW TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

Under the Privacy Act 2020, you have the right to access and correct your Personal Information.

In accordance with the Privacy Act 2020, Penberthy Insurance Limited will:


- Give you the opportunity to access the Personal Information, we hold about you, and correct any errors in this Personal Information, generally without restriction. You may request access to your Personal Information by contacting your Financial Adviser.
- Provide our dispute resolution procedures to you, should you wish to complain about how Penberthy Insurance Limited handle your Personal Information.

Penberthy Insurance Limited aim is to have accurate and up-to-date information. When you receive policy schedules, renewal notices or other documents from your Financial Adviser, you should contact your Financial Adviser if you consider the information is not correct. Where reasonably possible and appropriate, your Financial Adviser will correct the information on Penberthy Insurance Limited's systems or held on their file or note your request to correct the information on our systems or files.

If you have a complaint or want more information about how Penberthy Insurance Limited are managing your Personal Information, please contact the Privacy Officer.

For security reasons, any request for details of Personal Information held by Penberthy Insurance Limited must be made in writing.

If you wish to access your personal information, please contact your Financial Adviser or write to

 Privacy Officer  
Penberthy Insurance  
Limited P O Box 33545  
Takapuna  
Auckland 0740

 or email [compliance@penberthy.co.nz](mailto:compliance@penberthy.co.nz)


## COMPLAINTS

If you do have a complaint about privacy, we ask that you contact our office first to help us to assist you promptly.

To resolve a complaint, we:

- Will liaise with you to identify and define the nature and cause of the complaint
- May request that you detail the nature of the complaint in writing;
- Will keep you informed of the likely time within which we will respond to your complaint;
- Will inform you of the reason for our decision in resolving such complaint; and
- Keep a record of the complaint and any action taken in our Register of Complaints.

If you have a complaint, please contact your Financial Adviser or contact our Privacy Officer during business hours on:

 +64 9 486 1175

 [complaints@penberthy.co.nz](mailto:complaints@penberthy.co.nz)

 Privacy Officer  
Penberthy Insurance Limited  
P O Box 33545  
Takapuna  
Auckland 0740

We welcome your questions and comments about privacy.

You can also obtain information on privacy issues in New Zealand on the Office of the Privacy Commissioner website at [www.privacy.org.nz](http://www.privacy.org.nz) or by contacting them by email at [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz) or by calling on +64 4 474 7590.

This Privacy Statement is current from 1st December 2020. If this Privacy Statement or any part thereof is amended or modified in the future, the revised version will be available by contacting our office or on our website.