

# Privacy Policy

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## Introduction

Your privacy is important to Financial Synergy Limited ("**Financial Synergy**", "**we**", "**us**", "**our**"). This Privacy Policy discloses how Financial Synergy collects, protects, uses and shares personal information gathered from brokers, borrowers and all users of our website.

All personal information is collected in a fair and non-intrusive manner, with your voluntary consent. Financial Synergy recognises the need for appropriate protections and management of personal information. This Privacy Policy will assist you to understand what types of information we may collect, how that information may be used, and with whom the information may be shared.

## What type of information do we collect?

In this Privacy Policy, "personal information" means any information about an individual from which that individual can be identified. The personal information we collect includes the following:

- Identity information (about brokers, borrowers and any users we communicate with): including first name, last name, company name (if borrower or broker is a company) and job title.
- Contact information (about brokers, borrowers and any users we communicate with): including address, email, telephone numbers and records of communications with us.
- Financial information (in relation to borrowers): including bank account and payment details.
- Credit information (in relation to borrowers): including credit history and information received from credit reference agencies.
- Policy information (in relation to borrowers' policies with insurance providers): including policy number, insurance company, policy period, interest and premium amounts.
- Profile information (in relation to brokers using Financial Synergy's online tools): including authentication information, passwords and account usage information.
- Borrower loan information: including transaction history, loan balances and repayments.
- Broker arrangements: including transaction history and associated borrowers.

We will notify you where it is mandatory to provide personal information. Otherwise, the personal information that you submit is gathered only on a voluntary basis; you may choose not to provide personal information, but this may mean that you are unable to access certain services.

## Purpose

We use your personal information for the following purposes:

- Providing our services (e.g. providing and administrating loans to borrowers and facilitating the use of our online tools by brokers), including by cooperating and sharing personal information relating to borrowers with brokers and insurance providers.
- Responding to queries from existing and potential borrowers, brokers and other users of our website.
- Communicating with borrowers and brokers in relation to our services, any contract we may have with them and seeking feedback on our services.
- Credit and risk assessment, management and reporting (which may include obtaining credit checks on borrowers from third-party agencies, running PPSR searches where relevant and providing credit reporting).
- Communicating with insurers, brokers and borrowers in relation to our services and the funding we provide, and ensuring payments are made in time.
- Monitoring (and enforcing) compliance with the law and any contracts with us.

## Cookies

We may use data collection devices such as "cookies" on our website to help analyse our web page flow and measure effectiveness. Cookies are pieces of information a website sends to an individual's hard drive while they are viewing the website. Cookies allow the website to collect certain information about you and how you use our website in order to make your visit to the site more useful and to help improve your future visits.

If you do not wish to receive a cookie or if you wish to set your browser to warn you each time a cookie is being sent, or if you wish to turn off all cookies, use the options on your browser to assist you. The 'Help' option on your browser may assist you in

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changing your cookie preferences. If you disable or refuse cookies, please be aware that some parts of this website may not function properly.

### Links to Third-Party Websites

This website may contain links to third-party websites for your convenience and information. Financial Synergy does not control those sites or their privacy practices. We do not endorse or make any representations about third-party web sites. The personal data you choose to give to unrelated third parties is not covered by this Privacy Policy. We encourage you to review the privacy policy of any company or website before submitting your personal information. Some third parties may choose to share their personal data with Financial Synergy; that sharing is governed by that third party's privacy policy.

### Sharing of Personal Information

We do not sell personal information to third parties. Except as described in this privacy policy, Financial Synergy will not disclose personal information to any third party, unless it is your request, you consent to such disclosure, or disclosure is required or authorised by law.

We do share personal information with our business partners (including brokers, insurers and credit agencies) and their related companies (as defined in the New Zealand Companies Act 1993), employees and agents in order to provide and administer our services and for the purposes listed above in this Privacy Policy. We may also share personal information with our service providers that hold or procure data on our behalf. Some of our systems are hosted by providers based overseas (i.e. in Australia) so this may involve transferring personal information outside of New Zealand.

Where we do share your personal information, we ensure the recipient is prohibited from using that information for any purpose other than to provide assistance with fulfilling the purposes stated in this Privacy Policy (and in the case of brokers and insurers, to administer the insurance policies you hold in accordance with their own privacy policies).

### Storage, Retention and Accuracy of Personal Information

Financial Synergy will take reasonable steps to ensure that personal information is safeguarded against loss, access, use, modification, disclosure or other misuse. All reasonable steps are taken to prevent unauthorised use or disclosure of your personal information.

Financial Synergy will retain your personal information only for as long as necessary to fulfil the purpose(s) for which it may lawfully be used (but note that this may be for longer than our relationship with you). We do not retain personal information for any longer than we are lawfully permitted to.

Financial Synergy takes all reasonable steps to ensure that your personal information is accurate, up-to-date, complete, relevant and not misleading.

### Contact Information

You may contact us to access, or request correction or deletion of your personal information. To do so, or if you have any complaints or any questions relating to this privacy policy, please do not hesitate to contact us using the following details:

Financial Synergy Limited

Email us: [info@financialsynergy.co.nz](mailto:info@financialsynergy.co.nz)

Mail: P.O. Box 106-935, Auckland 1143, New Zealand

### Changes to our Privacy Policy

We may modify, alter or otherwise update this Privacy Policy from time to time by posting a new version of this Privacy Policy on the <http://financialsynergy.co.nz/> website. You should check this Privacy Policy regularly to make sure you have read and understand the latest version.

This Privacy Policy was last updated on: 20<sup>th</sup> of February 2020.

This privacy policy is governed by New Zealand law. For more information about privacy issues in New Zealand and protecting your privacy, visit the [New Zealand Privacy Commissioner's website](#).