

# CrediFlex New Zealand Ltd Privacy Policy

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## **1. Who is CrediFlex?**

CrediFlex New Zealand Ltd (“CrediFlex”) is a professional intermediary business offering clients access to a range of Financial Services including mortgage, equipment and commercial lending products.

## **2. Protecting Your Privacy**

Protecting your privacy and the confidentiality of your personal information is a priority at CrediFlex. We have an ongoing commitment to treat very seriously the trust you have in us to protect your personal information.

CrediFlex is bound by the Privacy Act 1993.

This CrediFlex Privacy Policy explains how we protect your privacy. This policy applies equally to the customers, staff and partners of CrediFlex.

## **3. What Is Personal Information?**

Personal information is any information about you that identifies you or by which your identity can be reasonably determined.

## **4. How We Collect Your Personal Information**

We collect most personal information directly from you and this may take place in a number of ways such as when you wish to make use of our services, make application for a specific product or contact us over the phone or internet. On occasions we may also source personal information about you from a third party such as one of our business alliance partners or government agencies.

Often personal information is collected during the course of our relationship with you, for example when you seek a variation to a loan that we have previously established on your behalf.

Typically the personal information we collect may include your name, address, telephone number, date of birth, annual income and other financial details, employment details and credit history. In certain circumstances we may also collect sensitive information such as health information.

## **5. How We Use Your Personal Information**

We will tell you the purposes for which we intend to use your personal information.

We use the personal information that we collect so that we can conduct our business of intermediating Financial Services in line with your requirements and to administer and enhance the relationship we have with you. If you do not provide this information,

we may not be able to deal with you, or provide you with our products, services and other information.

We may also use personal information we collect about you for other purposes such as:

- Considering any other application for services or request for information made by you to us;
- Helping us to develop and identify products and services that may interest you;
- Telling you about products and services (unless you have asked us not to);
- Maintaining our relationship with you;
- Conducting market or customer satisfaction research;
- Performing our internal administration and operations including: accounting, risk management, record keeping, archiving, systems development and testing, credit scoring and staff training;
- Complying with legislative and regulatory requirements.

We may disclose personal information to third parties when we contract out some of our functions and activities. For example we may provide names and addresses to a mailing house to mail letters to you and other customers. In these situations we prohibit third parties from using your personal information except for the specific purpose for which we supply it.

## **6. Sensitive Information**

We only collect sensitive information about you with your consent, unless we are legally required to collect that information.

Sensitive information, as defined by law, is any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional, trade association or trade union, sexual preferences or practices, criminal record or health information.

We will only collect sensitive information where necessary for establishing and maintaining our relationship with you and / or providing you with the products and services you require. For example, health information will be recorded in the process of taking an application for life or income protection insurance.

## **7. Your Consent Is Important**

Personal information is usually used or disclosed only after obtaining your consent. Your consent can be expressed or implied.

Your express consent can be written or verbal. For example when a finance application is taken from you, which includes your personal information, you will be requested to sign a Privacy “Authority and Declaration” which incorporates an authority to undertake credit checks.

If you do not consent to certain uses of personal information, we may not be able to deal with you or provide you with a particular product or service.

## **8. Sharing of Personal Information Within CrediFlex**

For CrediFlex to service its relationship with you and carry on business as a group, it is important that we have the capacity to share your information with other entities within the CrediFlex Group.

We will obtain your consent to share your personal information within CrediFlex and only for the purposes to which you have agreed.

## **9. Disclosing To Third Parties**

We only disclose your personal information to third parties with your express or implied consent, or where we are otherwise required to do so. The types of third parties we may disclose your personal information to include:

- Lending institutions with which we have accreditations as a financial intermediary;
- Credit reporting agencies, to assess your credit application;
- Debt collecting agencies, to initiate debt collection services;
- Other organisations with whom we have arrangements or business alliances for the purpose of promoting our respective products and services;
- Our agents, contractors and external advisers who we engage from time to time to carry out or assist us to carry out our functions and activities;
- Your agents including your legal and financial advisers;
- Your insurer or insurance broker;
- Your executor, administrator, trustee, guardian or attorney;
- Your referees (including your employer), e.g. to validate information you have provided in a credit application;
- Regulatory bodies, government agencies, law enforcement bodies, courts and other parties we are authorised or required to disclose information to;
- Any mortgage insurer used by one of our accredited lenders and any reinsurer of any such mortgage insurer;
- Sureties and guarantors or potential sureties or guarantors;
- Any Licensed Securities Dealer, Life Insurance Company, or Fund Manager that we have a current or past relationship with.

Some of these third parties may be located overseas and not be subject to the same privacy obligations as CrediFlex. We will only transfer your personal

information overseas if it is necessary to undertake a transaction on your behalf or if we have your consent.

## **10. Marketing and Privacy**

Serving customers well is fundamental to our business. As part of this service we may use personal information we have collected to identify products and services that may benefit you. We may contact you from time to time to tell you about new or existing products or services.

You may contact us at any time if you do not wish to receive this type of information from CrediFlex. We will process these instructions as soon as practicable.

CrediFlex does not disclose names and addresses to third parties for the purposes of allowing them to market their products and services.

## **11. Keeping Personal Information Up To Date**

If we have accurate information about you, it enables us to provide you with the best possible service.

We take reasonable steps to ensure that your personal information is accurate, complete and up to date at the time of collecting, disclosing or using the information.

If you learn that personal information we hold about you is inaccurate, incomplete or out of date, you should contact us.

We will promptly update any personal information that is inaccurate, incomplete or out of date.

## **12. Accessing Your Personal Information**

Subject to some exceptions, you can find out what personal information CrediFlex holds about you and / or which third party (e.g. a financial institution as part of an application for finance) personal information may have been provided to.

You should contact us if you wish to find out what personal information we hold about you. Where a third party is concerned we will provide details to allow you to contact the third party direct to request details of the information they hold.

We will need to verify your identity before giving you access to any of this information.

We will normally be able to deal with your request immediately. If the request is complex then we will ask you to provide a written request. We can usually deal with such a request within 14 – 30 days. Depending on the complexity of your request we may charge a fee for processing the request.

### **We may not be able to give you access**

We may not be able to tell you what personal information we hold about you in certain circumstances, including where:

- it will threaten the privacy of other individuals;
- the information relates to anticipated legal proceedings;
- the information would reveal commercially sensitive processes; or
- the law prevents us from disclosing the information.

If we are unable to tell you what personal information we hold about you, we will give you the reasons why and attempt to find alternative means to enable you to access your information.

### **13. Secure Storage of Your Personal Information**

The security and confidentiality of client information is of paramount importance.

Your personal information can only be accessed by people authorised by us and for the purposes for which you have given your consent.

Your personal information may be stored in hardcopy documents or electronically in our systems.

We maintain physical security, such as locks and security systems, over our paper and electronic data stores and premises. We also maintain computer and network security: for example, we use firewalls (security measures for the Internet) and other security measures such as identification codes and passwords to control access to computer systems.

### **14. Destruction of Personal Information No Longer Needed**

We will destroy personal information if it is no longer needed:

- for the purposes for which we collected it; or
- for the purposes of meeting legal requirements.

We will properly dispose of all paper files, letters, correspondence and any other hard copy documents that contain personal information that is no longer needed. All information stored in electronic form that is no longer required will be deleted from our systems.

## **15. Our Privacy Policy May Change From Time To Time**

CrediFlex constantly reviews all its policies and procedures to keep up to date with changes in the law, technology and market practice. As a result we may change this Privacy Policy from time to time with the current version published on our web site at [www.crediflex.co.nz](http://www.crediflex.co.nz).

## **16. To Contact Us About Privacy**

If you would like further information about this Privacy Policy, to request access to personal information or you think we have breached any aspect of this Privacy Policy please contact us by:

- E – Mail at [talktocrediflex@crediflex.co.nz](mailto:talktocrediflex@crediflex.co.nz) marked for the attention of the Privacy Officer.
- Contact the Privacy Officer at CrediFlex Auckland on +64 9 970 8800.
- Write to the Privacy Officer c/-: CrediFlex NZ Ltd, PO Box 26 713, Epsom, Auckland.