

1. Policy Rationale

- 1.1 Your privacy is important to AFSL (a Charitable Trust registered under the Charitable Trusts Act 1957 and referred to in this Privacy Policy as AFSL, we, our or us). AFSL is bound by the Privacy Act 2020 (Privacy Act).
- 1.2 This Privacy Policy explains how we collect, use and disclose the personal information that we collect from you or which we have obtained about you from a third party. In summary, “personal information” is information about an identifiable individual. This Privacy Policy sets out various rights that you have in relation to that personal information. Please take a moment to read and understand it.
- 1.3 By providing your personal information or using our services, website, resources or funding, you agree to this Privacy Policy. If you are providing information about any other person, then you confirm that in providing such information, you are authorised by that other person to do so.
- 1.4 If you do not provide us with any of the personal information we may request from you from time to time, it may adversely impact our ability to provide to you, our services, website, resources or funding and/or we may be unable to provide you with the information that you request from us.
- 1.5 We may change this Privacy Policy from time to time to time. The most current version of this Policy is located on our website.
- 1.6 This Privacy Policy explains:
 - who we collect personal and organisational information about;
 - how we collect personal information;
 - the kind of personal information we collect;
 - how we collect, hold and use your personal information;
 - how we may share your personal information;
 - how we use cookies and Google Analytics;
 - how you can access/correct your personal information;
 - how long we hold personal information;
 - how we manage personal information; and
 - who you can contact for further information.

2. Who do we collect personal information about?

- 2.1 We collect and hold personal information about (but not limited to):
 - organisations who access our financial services;
 - suppliers and their employees and contractors;
 - prospective employees, contractors, and other staff; and

- other people who interact with AFSL.

3. How we collect personal information?

3.1 Except as otherwise permitted by law, we will collect personal information in the following ways:

- directly from you when you interact with us, including:
 - when you sign a formal engagement letter for services;
 - when you sign into our office for health and safety purposes;
 - when you register for, and access, any of our resources made available to you (including through our website);
 - when you contact us seeking information about us, our services;
 - when you apply for a job with us;
 - when you respond to a survey AFSL is running; and
 - when you are on any of our premises or property in which we installed a CCTV or similar security system;
- from publicly available sources.

4. The kind of personal information we collect

4.1 The personal information we may collect includes:

- the personal information you provide to us in your interactions and communications with us or our service providers (individuals or entities that are engaged by AFSL to deliver specific services that support its operations or charitable purposes); and
- your image, as you may be recorded by any CCTV or similar security system on our premises or properties or where AFSL is undertaking its business activity.

5. How we collect, hold and use your personal information

5.1 In general, we use your personal information for the following purposes:

- to conduct our operations;
- to provide to you the information you request from us;
- to provide to you our services;
- to manage, administer and monitor the provision of our services and other internal administration purposes, including accounting, planning, risk management and training;
- to improve, develop, market and provide information about us and our services;
- for recruitment purposes, including assessing a candidate's suitability for a position with us as an employee, contractor or service provider;

- for our reporting purposes (including, to relevant third parties);
- to comply with any legal requirement, including any applicable law, court order, other judicial process, or the requirements of a regulator, and as otherwise required or permitted by law; and
- any specific purpose which we notify you of at the time personal information is collected or any other purpose which you may authorise from time to time.

6. How we may share your personal information

6.1 In providing our services to you, or for any of the other purposes mentioned above, we may share your personal information with:

- Government, regulatory bodies, and enforcement agencies such as Chartered Accountants Australia and New Zealand, the IRD;
- our contractors, advisers and third party service providers; and
- any other third parties you may authorise us to share your information with, or where we are required to do so by law.

7. How we use cookies and Google Analytics

7.1 We use cookies developed by our third-party service providers such as Google Analytics for a number of purposes, including improving our services and enhancing your online experience with us.

7.2 A cookie is a small data file that the website sends to your browser, which may then store it on your system for later retrieval by the website. Cookies track your movements through different websites; they do not record any other personal information about you. Cookies are widely used on websites to help with navigation and to help personalise your experience when you visit a website. If you reject cookies, you may still use our website, but your experience may be affected, and your ability to use some areas of our website may be limited. To learn more about cookies www.allaboutcookies.org

7.3 In addition to cookies, we use Google Analytics to understand and optimise your experience. You can see how Google collects and uses data when you access our website here: <https://policies.google.com/privacy?hl=en-US>

8. How you can access/correct your personal information

8.1 If you wish to obtain confirmation that we hold personal information about you and to access that information, or you wish to request a correction to your personal information that we hold, please contact us at enquiries@aktivefinanceservices.org.nz

8.2 If you request access to, or a copy of, your personal information, we will provide you

with a copy of the personal information we keep about you unless there is good reason (in accordance with the Privacy Act) for not doing so.

8.3 When making such a request, we will require you to verify your identity and to specify what personal information you would like to access or correct. We reserve the right to charge you a reasonable amount for providing copies of any personal information you request, to take into account the time, cost and effort involved.

8.4 If you request a correction to your personal information, you may also provide us with a statement of the correction sought. If we do not agree to your request for correction of your personal information, you may request that we take reasonable steps to attach to the information the statement of correction sought but not made.

9. How long we hold personal information

9.1 We will keep your personal information only for as long as is necessary for the purpose for which it was collected. If your personal information is no longer required by us, we will comply with our legal obligations to securely destroy and/or delete this information.

10. Management of personal information

10.1 We take reasonable steps to protect personal information held by us from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records. AFSL's data is saved in the Microsoft SharePoint and OneDrive environment, administered by Microsoft engineers and hosted in the Microsoft Azure Cloud Platform.

11. Who you can contact for further information

11.1 We endeavour to ensure that the personal information we hold is accurate, complete and up to date. We encourage you to contact us in order to update any personal information we hold about you. Our contact details are set out below. You have the right to correct any personal information we hold about you in accordance with the Privacy Act.

11.2 If you have any queries about this Privacy Policy, personal information we have collected about you, or wish to complain about the handling of your personal information by us, please contact:

11.3 Postal Address: AFSL, AUT Millennium, Ground Floor 17 Antares Place, Rosedale.
Email Address: enquiries@aktivefinanceservices.org.nz

11.4 If we are unable to satisfactorily resolve your concerns about our handling of your personal information, you can contact the Office of the Privacy Commissioner at: PO Box 10-094, The Terrace, Wellington 6143, phone 0800 803 909 or visit <http://privacy.org.nz>