

Common Ground Financial Services (CGFS) Privacy Policy

Common Ground Financial Services (CGFS) must comply with the Privacy Act (the Act) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

A person is not required to provide the personal information that we request but, if that person chooses not to do so, in many cases we will not be able to provide our services.

CGFS has a privacy policy to ensure it is meeting its regulatory requirements and customer best practice commitments regarding managing privacy obligations.

CGFS operates the Privacy policy to:

- Ensure a robust framework around Privacy requirements.
- Identify what CGFS considers to be private information.
- Set out how privacy complaints to CGFS will be recorded, responded to and reported.

This Policy is in accordance with the Privacy Act 2020

CGFS - HOW WE COLLECT PERSONAL INFORMATION

We collect personal information about an individual from that individual, through contact with us (for example, in a meeting, or via an email, website), or when we provide services to the individual.

We also collect information from third parties including from clients' related businesses, accountants, current providers of financial products (including insurers and lenders), medical service providers and employers.

We may also collect personal information from credit reporting agencies. Any information we collect from third parties is at the knowledge and approval of the client.

When a person visits CGFS website we may collect information including details of visits to our website such as traffic data, location data, cookies and website analytics.

HOW WE USE PERSONAL INFORMATION

We collect personal information for the following purposes:

- to provide and market our services (and to assist in improving our services)
- to respond to communications from a client
- to make contact with a client in the future about matters we believe will be of interest
- in connection with defending, protecting and/or enforcing our legal rights and interests including defending a complaint, claim or other action
- to conduct research and statistical analysis (on an anonymised basis)
- to undertake credit checks on clients (if necessary)
- to comply with our obligations at law and to support us to engage with relevant regulator
- for any other purpose authorised by our client or the Act

WHO WE DISCLOSE PERSONAL INFORMATION TO:

We may disclose a client's personal information to:

- any business that supports provision of our services (including related companies, information technology service providers, professional compliance services providers, lawyers, accountants);
- financial product providers in connection with assisting clients to apply for financial products and services, administer financial products and services, make claims under financial products, renew, vary, replace or exit/end financial products or services;
- third parties noted above in order to obtain relevant required information;
- regulatory bodies including the Financial Markets Authority (whether or not required by law);
- lawyers and other professionals, and our insurers (and their advisers), in connection with defending, protecting and/or enforcing our legal rights & interests;
- debt collection agencies;
- any other person authorised by the Act or another law.

A business that supports provision of our services may be located outside New Zealand. This may mean that personal information is held and processed outside New Zealand.

HOW WE PROTECT PERSONAL INFORMATION

We will:

- Take steps that are reasonable in the circumstances to keep personal information safe from loss and from unauthorized access, use, modification or disclosure.
- Employees are not allowed to access or share client information unless it is in the course of standard business processes.
- We will identify and delete all files seven years after the end of the customer's relationship.

ACCESSING AND CORRECTING PERSONAL INFORMATION

Subject to the certain grounds for refusal set out in the Act, an individual whose information we hold has the right to access their personal information and the right to request a correction to that personal information.

INTERNET USE

While we take reasonable steps to maintain secure internet connections, if a person provides us with personal information over the internet, the provision of that information is at the provider's own risk.

If a person follows a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We recommend that the site's privacy policy is reviewed before any personal information is provided.

PRIVACY BREACH

A privacy breach occurs when an organization or individual either intentionally or accidentally:

- Provides unauthorised or accidental access to someone's personal information.
- Discloses, alters, loses or destroys someone's personal information.
- A privacy breach also occurs when someone is unable to access their personal information due to, for example, their account being hacked.
- CGFS is obligated to notify the Privacy Commissioner and any affected people as soon as is practically possible for any privacy breach that either has caused or is likely to cause anyone serious harm.

REPORTING OF PRIVACY BREACHES:

CGFS will undertake an analysis of a privacy complaint to identify if it is serious and systemic in nature.

Where a privacy breach of this nature occurs CGFS will, in accordance with their obligations under the Privacy Act notify the privacy commissioner and the individuals impacted by the breach.

RESPONDING TO CLIENT INFORMATION REQUESTS

When a client requests their information, we are obligated to provide that information to them. When a request is received, we will notify the Director of CGFS. We will provide the information to the client within 20 working days, we will also notify the client if we do not have any related information for the client.

- The information could be held in:
 - Physical files
 - Digital or electronic files
 - File notes
 - Applications
 - Data held on the client CRM; and / or
 - Communication records

CGFS will ensure staff and Advisers are trained on privacy obligations, including using tools provided by the Privacy Commissioner.