

EBFA LIMITED (FSP 1005644) – PRIVACY POLICY

Introduction

At EBFA Limited (referred to as "we," "us," or "our"), we adhere to the regulations outlined in the New Zealand Privacy Act 2020 (referred to as "the Act") when handling personal information. Personal information refers to any details concerning an identifiable individual (a natural person). The purpose of this policy is to establish our procedures for collecting, utilizing, disclosing, and safeguarding your personal information. Under the Privacy Act, there are specific principles that we must adhere to. One such principle is that we are only allowed to utilize information for the purposes for which it was originally collected. Our client information is stored using various systems, including email, as well as third-party providers like Quote Monster and Xero. Additionally, if necessary, we may also keep hard copies of client files in our office.

This policy does not restrict or waive any of your rights as outlined in the Act. If you require additional information regarding the Act, you can reach out to us via email or visit www.privacy.org.nz for more details.

What is personal information?

Personal information refers to data pertaining to a specific individual that can be used to identify them. This may encompass various details such as, but not limited to, their name, address, contact information, date of birth, occupation, payment details, employment history, financial information, testimonials and feedback, evidence of the source of funds or wealth (where applicable), and other relevant information.

How we will use your personal information?

We will use your personal information:

- To verify your identity
- To deliver services and products to you
- To promote our services and products to you, which may involve reaching out to you through electronic means such as text messages or emails.
- To enhance the quality of the services and products we offer you
- To address any communication received from you, including handling complaints
- To safeguard and/or assert our legal rights and interests, which includes defending against any claims.
- For any other purpose authorised by you or the Act.

Disclosing your personal information

We may disclose your personal information to:

- External entities or individuals who aid us in delivering services or perform tasks on our behalf, including mailing houses, hosting and data storage providers, specialized consultants, and legal advisors
- Providers of products, including but not limited to lenders and insurance companies.
- Financial advisors and financial advice providers who utilize our services.
- Third-party entities or individuals responsible for conducting necessary or desirable checks such as compliance reviews and audits on our behalf
- Organizations, agencies, or individuals maintaining databases for identity verification purposes, including but not limited to the New Zealand Department of Internal Affairs and New Zealand Transport Agency
- Courts, tribunals, and regulatory authorities such as the Financial Markets Authority and Ministry of Justice in New Zealand
- Office of the Ombudsman in the case of a complaint relating to official information
- Any person or agency whom we believe can assist in addressing a significant privacy breach.
- Office of the New Zealand Privacy Commissioner in the event of a complaint concerning a breach of the Privacy Act 2020.
- Human Rights Commission in the case of a discrimination complaint.
- CERT NZ, if appropriate, for managing a voluntarily reported privacy breach
- Overseas privacy regulators in the event of a complaint involving the actions of an overseas agency; and
- Any other individual or entity to whom you have provided authorization for disclosure.

Apart from the circumstances outlined above, we shall not reveal your personal information without obtaining your written or oral consent, except in cases where it is mandated by the applicable law.

Protecting your personal information

We are committed to safeguarding your personal information and will implement reasonable measures to prevent loss, unauthorized access, and misuse. Our software undergoes regular audits to ensure ongoing compliance with security requirements.

Storing your personal information

Personal information will be kept for the necessary duration as per lawful usage purposes. Online data is securely stored and can be recovered in case of data loss or corruption. If information is given to us by a client or associate outside of our software or in physical form for business purposes, it may be stored at 389 Surrey Road, Tariki 4388 on our premises. We are required to keep information for seven years after our client relationship ends. We will

dispose of it appropriately, by destroying and de-identifying any personal information at the end of the seven year period.

Accessing and correcting your personal information

You have the right to access and correct your personal information that we hold, except in cases where specific grounds for refusal outlined in the Act apply. To exercise this right, we require evidence confirming your identity as the individual to whom the personal information pertains. Regarding a request for correction, if we find the correction reasonable and within our capability, we will make the necessary changes to the personal information. If we are unable to make the correction, we will make a reasonable effort to document your request for correction on the personal information. To exercise either of these rights, please send an email to emma@ebfa.co.nz, providing evidence of your identity and outlining the specific details of your request (such as the personal information or correction you are seeking).

Data Breaches

In the unfortunate event of a data breach, our Privacy Officer has established protocols and systems to address the situation. Should a data breach occur, we will swiftly take action to identify, report, and investigate the breach involving personal data.

Where there is a loss or unauthorised access or disclosure of your personal information that is likely to cause you serious harm, we will, as soon as we become aware of the breach notify you personally.

Internet use

Although we make efforts to ensure secure internet connections, please be aware that if you choose to provide us with personal information online, there is a risk involved and it is done at your own discretion. When you click on a link on our website that redirects you to another site, please note that the owner of that site will have their own privacy policy governing your personal information. We recommend reviewing their privacy policy before sharing any personal information. In order to monitor the usage of our systems, we may engage one or more third-party suppliers. These suppliers will have access to monitoring and logging information, as well as information processed on our websites and other IT systems.

How do we know we comply?

- We periodically review the Privacy Commissioner's website for guidance on managing client privacy.
- We review the guidelines developed by the NZ Government to help prevent breaches of data. <https://www.cert.govt.nz/businesses-andindividuals/>

- When we use a new provider, we check their terms and conditions to understand how they store and use our client information and data.
- We maintain a Breach Register and we know how to record and manage a breach.

Changes to this policy

We may change this policy by uploading a revised policy onto the website. The change will apply from the date that we upload the revised policy with a new version number. All replaced policies will be stored safely.

Privacy Policy queries and concerns

If you are concerned about how your personal information is being handled or if you feel that we have compromised your privacy in some way, please contact us at: emma@ebfa.co.nz and we will aim to resolve complaints as quickly as possible.

We review this Privacy Policy periodically to keep it current and available on our website