# Privacy Policy

**Wright Financial Solutions Ltd and Wright Business Solutions Ltd t/a Wright Financial**
**Prepared in accordance with the Privacy Act 2020 and associated New Zealand privacy obligations**

## 1. Purpose

We understand that how we collect, use, disclose and protect your personal information is important. Protecting your information and being transparent about how it is handled forms an important part of our relationship with you.

This Privacy Policy explains how Wright Financial Solutions Ltd and Wright Business Solutions Ltd t/a Wright Financial ("Wright Financial", "we", "our", "us") collect, use, store, disclose and protect personal information in accordance with the Privacy Act 2020 and other applicable laws and regulations in New Zealand.

This Privacy Policy also explains your rights regarding your personal information, including your rights to access and correct your information.

## 2. Consent to this Privacy Policy

By contacting us, engaging our services, interacting with our digital platforms, or providing personal information to us, you acknowledge this Privacy Policy.

If you do not agree with this Privacy Policy, please contact us directly rather than using our online platforms.

## 3. Collection of Personal Information

Personal information is information about an identifiable individual.

The types of personal information we collect will depend on the services being provided and the nature of your dealings with us. We only collect personal information that is reasonably necessary for our business activities and to provide financial advice and related services.

Where reasonable and practicable, we collect personal information directly from you.

We may collect personal information:

• over the telephone, mobile phone or video conferencing platforms;
• through our website or social media platforms;
• when you email, write to or otherwise communicate with us;
• during financial advice, lending, insurance or investment engagements;
• during onboarding and compliance processes**.**

The personal information we collect may include identification, financial, employment, lending, investment and insurance-related information.

## 4. Indirect Collection of Personal Information (IPP3A)

Sometimes we collect personal information about individuals from someone other than the individual concerned. This is known as indirect collection.

When we collect personal information indirectly, we take steps that are reasonable in the circumstances to ensure individuals are aware of:

• the fact that the information has been collected;
• the purpose of collection;
• the intended recipients;
• our identity and contact details;
• the law authorising or requiring collection, where applicable; and
• their rights to access and correct their information.

Our Indirect Collection Source Schedule sets out the common third parties we collect information from, the information involved, the purpose of collection, and who the information may be shared with.

The current version of the schedule forms part of Wright Financial's broader privacy and onboarding framework.

The schedule may include lenders, insurers, investment providers, credit reporting agencies, identity verification providers, employers, accountants, solicitors, professional advisers, referrers and publicly accessible registers used for verification or compliance purposes.

The current version of the schedule may also be made available through our website. You may also request a copy of the current Indirect Collection Source Schedule by contacting us at enquiry@wrightfinancial.co.nz.

We also use service providers to store or process personal information on our behalf. Those provider arrangements are managed separately from our indirect collection practices.

## 5. Collection from Other Sources

In some circumstances, we may collect personal information from publicly available sources, lenders, insurers, investment providers, credit reporting agencies, identity verification providers, employers, professional advisers, previous advisers and other third parties where authorised or permitted by law.

## 6. Cookies and Online Information

If you visit our website or interact with our online platforms, we may collect information through cookies and similar technologies.

Cookies help improve website functionality, security and user experience. You may disable cookies through your browser settings, although some website functionality may be affected.

We do not request sensitive personal information publicly through social media or public online forums.

## 7. Purpose of Collection and Use

We may collect, hold, use and disclose personal information for purposes including:

- providing financial advice and related services;
- arranging lending, insurance and investment products;
- verifying identity and meeting AML/CFT obligations;
- assessing eligibility for products and services;
- communicating with you;
- complying with legal and regulatory obligations; and
- responding to enquiries or complaints.

## 8. Storage and Protection of Personal Information

We take reasonable steps to protect personal information from loss, misuse, unauthorised access, modification or disclosure.

Security measures include controlled system access, employee confidentiality obligations, staff privacy training, secure cloud-based systems and appropriate contractual arrangements with service providers.

Some information may be stored electronically using cloud-based service providers, including providers located outside New Zealand. Where information is stored or processed overseas, we take reasonable steps to ensure appropriate safeguards are in place.

## 9. Retention of Personal Information

We retain personal information only for as long as reasonably necessary for business, legal and regulatory purposes.

Certain financial advice records are required to be retained for at least seven years under applicable regulatory requirements.

## 10. Privacy Breaches

If a privacy breach occurs that is likely to cause serious harm, we will respond in accordance with the Privacy Act 2020, including containing the breach, assessing risk, notifying affected individuals where appropriate, and notifying the Office of the Privacy Commissioner where required.

## 11. Disclosure of Personal Information

We may disclose personal information where disclosure is reasonably necessary to provide our services, authorised or required by law, consented to by you, or otherwise permitted under the Privacy Act 2020.

Personal information may be disclosed to lenders, insurers, investment providers, auditors, compliance providers, regulators, professional advisers and related entities within Wright Financial.

We do not sell personal information to third parties.

## 12. Overseas Disclosure

Some personal information may be transferred, stored or processed outside New Zealand through overseas service providers or cloud-based systems.

Where this occurs, we take reasonable steps to ensure the information remains protected through appropriate security and confidentiality arrangements.

## 13. Third Party Websites

Our website or online platforms may contain links to third-party websites. We are not responsible for the privacy or security practices of third-party websites.

## 14. Access, Correction and Information Rights

You may request access to, correction of, and in some circumstances deletion of, your personal information by contacting us.

We may require proof of identity before providing access or making corrections.

## 15. What Happens if You Do Not Provide Us Information

If requested personal information is not provided, we may be unable to provide some or all of our services or products.

## 16. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. The current version will be available through our website or on request.

## 17. Contact Details and Complaints

If you have questions, concerns or complaints about privacy or this Privacy Policy, please contact:

Wright Financial Solutions Ltd and Wright Business Solutions Ltd t/a Wright Financial
PO Box 9419, Waikato Mail Centre, Hamilton 3240
Or via phone on 07 834 0661
Or via email at enquiry@wrightfinancial.co.nz

If you are not satisfied with our response, you may contact the Office of the Privacy Commissioner:

Office of the Privacy Commissioner
P O Box 10-094
Wellington 6143, New Zealand
Email: **enquiries@privacy.org.nz**

Telephone: 0800 803 909
Website: **www.privacy.org.nz**

This Privacy Policy should be reviewed periodically to ensure it remains consistent with Wright Financial's operational practices, legal obligations and privacy procedures.