

External Privacy Policy

for Gilrose Finance Company Limited

Policy owner	[Gilrose Finance Company Limited]
Approver	General Manager and Owner
Review time frame	Annually
Next review date	[05/01/2022]

Document history

Version	Date	Amendments
V1	[05/01/21]	Approval of initial policy
V2	[05/01/21]	Updated to reflect Privacy Act 2020
V3		

Contents

Purpose	2
Collection of personal information	2
What happens if you do not provide us your information?	3
Purpose of collection and use of personal information.....	3
Disclosure of your personal information	4
Storage and protection of your personal information.....	4
Right to access and correct personal information.....	5
Changes to this Privacy Policy.....	6
Privacy Policy queries and concerns.....	6

Purpose

We know that how we collect, use, disclose and protect your information is important to you, and we value your trust. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

The purpose of this Privacy Policy is to inform our customers, users of our digital platforms (i.e. our website and application processes), and anyone who interacts with us about how we comply with the requirements of the New Zealand Privacy Act 2020 ("the Privacy Act") in managing personal information.

Collection of personal information

Personal Information is defined in the Privacy Act as information about an identifiable individual (a natural person as opposed to a company or other legal entity).

We only collect personal information that is necessary. Where reasonable and practicable, we will collect your personal information directly from you and inform you that we are collecting it.

We mainly collect personal information directly from you, for example:

- When you make an enquiry with us, apply for a loan with us or contact us in any way.
- When you provide documents that verify your identity and other personal details: such as your passport or drivers' licence number.

We may also collect personal information about you from third parties where we have your express consent. For example your professional advisers (for e.g. accountant or solicitor), credit reporters, banks, government agencies (such as NZTA and DIA), fraud prevention providers and AML solutions providers.

We may also collect information from publicly available sources (for example via the internet).

We are not responsible for the privacy or security practices of third parties that we collect information from and they are not covered by this Privacy Policy.

We will not ask you to supply personal information publicly. Sometimes we may invite you to send your details to us through a private message (by email), for example, to answer a question.

Types of personal information we collect

The types of personal information we collect will vary depending on the nature of your dealings with us. For example:

- if you are making an enquiry with us, we may collect your name and contact details and details of your enquiry.
- If you are applying for a loan, rental or lease we may collect your name, residential address, date of birth, contact details, identification document details (Driver Licence number, Passport details), financial and employment details and credit check information and reason for the loan, rental or lease.

- if we provide any of our products or services to you, we may collect information about your use of our products and services and repayment information.

What happens if you do not provide us your information?

If you do not provide information we have requested, you may be unable to obtain or access our services for which the information is required. Please ask us if you are unsure what information is important and how this might affect you.

Online device information and cookies

If you are visiting us through our website, then we collect information about your use and experience on these by using cookies. Cookies are small pieces of information stored on your hard drive or on your mobile browser. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

The cookies we send to your computer, mobile phone or other device cannot read your hard drive, obtain any information from your browser or command your device to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Gilrose Finance Company Limited website.

When you interact with us through our website, the information collected through the cookies may include:

- The date and time of visits;
- Website page (or pages) viewed;
- The website from which you accessed the internet and our website or other digital platform;
- How you navigate through the website and interact with pages (including any fields completed in forms and applications completed (where applicable));
- Information about your location;
- Information about the device used to visit our digital platform; and
- IP address (or addresses), and the type of web browser used.
- Time zone settings and mobile network information, postcode demographics, preferences and interests,

We use Google Services (Remarketing, AdWords and Analytics)

Purpose of collection and use of personal information

We primarily collect information from you to provide you with our products and services and to communicate with you. Any personal information you provide to us may be used for the following purposes:

- Consider any application you may make for our products and services, including checking your eligibility and validate your identity and the information you provide to us;

- Facilitate and administer the products and services we provide to you and monitor your compliance;
- Fraud prevention and detection;
- Communicate with you and provide information to you;
- Provide you with further information about our other products and services and promotional and marketing material about our products and services; and
- To comply with our legal obligations as a credit provider.

Disclosure of your personal information

We may disclose your personal information to others outside Gilrose Finance Company Limited where:

- It is necessary to enable us to achieve the purpose that we collected the information for – such as to provide our products and services to you;
- We are required or authorised by law to do so;
- You have given your authorisation; or
- We are permitted to use and disclose the information under the Privacy Act.

Parties we may disclose your information to

The third parties we may disclose your information include:

- Our professional advisers (lawyers, accountants) and service providers for the purposes of supplying services to us where the information is to be used solely for that purpose, such as those providing us with the following services: lending platform, information security, marketing, website data hosting, physical document storage.
- Our registered retailers where you purchase products from using our credit facilities.
- Credit reporters, debt collection agencies, fraud prevention providers, dispute resolution providers.

Storage and protection of your personal information

We record and store personal information which we collect from you electronically and in paper form. We will take all reasonable steps to keep your information secure and prevent unauthorised disclosure.

If we provide you with any passwords, it is important that you keep these confidential and do not allow them to be used by any other person. You should notify us immediately if the security of your password is breached, this will help prevent any unauthorised disclosure of your personal information.

We use a range of physical and electronic security measures to protect the security of the personal information we hold, including:

- Access to information systems is controlled through identity and access management;

- Our buildings are secured with a combination of locks and monitored alarms to prevent unauthorised access;
- Employees are bound by internal information security policies and are required to keep information secure;
- Employees are required to complete training about information security and privacy;
- When we use service providers to process or store information, we put arrangements in place to protect your information;
- We regularly monitor and review our compliance (and our service providers' compliance) with internal policies and industry best practice; and
- We only keep information for as long as we need it, or as long as the law requires us to. We have a records management policy that governs how we manage our information and records to make sure we destroy any information that is outdated, irrelevant or unnecessary.

Cloud-based service providers

We use third party service providers to store and process most of the information we collect. At the date of this Policy, we use Microsoft Exchange Server 2016 cloud servers located in Auckland. We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

Timeframes for keeping personal information

We retain your information for as long as we need to carry out the purposes of collection, or longer if we are required to by law.

Sending your information overseas

We may send your personal information outside New Zealand to overseas service providers or other third parties who process or store our information, or provide certain services to us. We make sure appropriate security arrangements are in place.

Third party websites

Through our website, you may be able to link to other websites which are not under our control. We are not responsible for the privacy or security practices of those third-party websites and the sites are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies and we encourage you to read them.

In addition, we have no knowledge of (or control over) the nature, content, and availability of those websites. We do not sponsor, recommend, or endorse anything contained on these linked websites. We do not accept any liability of any description for any loss suffered by you by relying on anything contained or not contained on these linked websites.

Right to access and correct personal information

You have the right to request access to and correct of your personal information. You can do so by contacting us at:

- Gilrose Finance Company Limited, PO Box 303 018, North Harbour, Auckland 0751
- Or via email at [privacy.officer@gilrose.co.nz]

When you contact us with such a request, we will respond to your request as soon as reasonably practicable and in accordance with the Privacy Act. To protect the security of your personal information, you may be required to provide identification before we update or provide you with access to your personal information.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access or to correct your personal information, we will in most circumstances let you know our reasons.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

Changes to this Privacy Policy

We review this Privacy Policy periodically to keep it current and available on our website. We may change this Privacy Policy at any time by posting a new Privacy Policy on our website. If the changes are significant, we may advise you directly.

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:

- Gilrose Finance Company Limited, PO Box 303 018, North Harbour, Auckland 0751
- E: privacy.officer@gilrose.co.nz
- Ph: 0800 33 22 28]

We will acknowledge your complaint within three working days of its receipt. We will let you know if we need any further information from you to investigate your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five working days, but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are not satisfied with our response to any privacy related concern you may lodge a complaint on the Privacy Office website (www.privacy.org.nz) or send a complaint form to the Privacy Commissioner at:

Office of the Privacy Commissioner

P O Box 10-094
Wellington 6143, New Zealand
Fax: 04- 474 7595
Email: enquiries@privacy.org.nz

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