Privacy Policy

1. Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy commitment in respect of personal information we hold about you and what we do with that information.

It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Privacy Principles set out in the Privacy Act 2020 (or any successor legislation) (the **Privacy Act**) and all other applicable laws. This Privacy Policy applies in addition to, and does not limit, our rights and obligations under the Privacy Act and other applicable laws.

2. Who are we

References in this Privacy Policy to "**we", "us"** and "**our"** means,

Jeeson Joseph - SWIFT Mortgages Limited

acting through a Financial Adviser.

3. Your authorisation

By providing us with personal information or engaging us to provide you with services, you consent to the collection, use, storage and disclosure of personal information in accordance with this Privacy Policy.

4. Changes to our Privacy Policy

We may change our Privacy Policy from time to time, by providing you with an updated version, to reflect changes in the law and also our business needs so long as the changes do not disadvantage you. By continuing to engage us you will be deemed to have accepted the updated Privacy Policy.

5. What personal information do we collect?

When we refer to personal information we mean information that identifies, or is capable of identifying, you. This includes, for example, your name, date of birth, address, contact details, account details and occupation.

If you engage us to provide services to you, we may collect personal information about your financial situation or goals in order to recommend mortgage and insurance products that we are permitted to advise on (**Products**).

6. Why do we collect your personal information?

We collect your personal information for the purposes of our and relevant third parties' services and relationship with you (refer to section 9 below: "Who do we disclose your personal information to?"). For example:

- responding to your requests or inquiries;
- providing services to you (e.g. to enable us to recommend Products to you);
- sending communications and direct marketing to you about products and services we think may be of interest to you (whether through mail, telephone or electronic means (including email and SMS/MMS);
- market research; and
- any other purpose authorised by you or the Privacy Act.

If you do not wish to receive marketing information, you may 'opt out' at any time by notifying us.

We may also collect personal information (including credit information and health information) on behalf of the lenders, insurers and other providers of Products that you choose to apply for

(**Product Providers**). Product Providers will have their own Privacy Policy that applies to the information that we collect on their behalf.

7. How do we collect your personal information?

Generally we will collect your personal information directly from you. For example, we collect your personal information if you submit information to us, make inquiries via email or provide personal information during conversations between you and us.

We may also collect your personal information from:

- NZ Financial Services Group Limited (**NZFSG**) and its related bodies corporate;
- credit reporting agencies;
- with your authorisation, banks (e.g. through the use of illion BankStatements) and employers;
- Product Providers (e.g. during the term of any loan or insurance we have arranged on your behalf, in order to answer your queries or assist you with your financial arrangements as your circumstances change). If applicable, the Product Providers may also periodically disclose your loan balance or premium to us in connection with the payment of ongoing commission to us over the term of your loan or insurance; and
- any other person authorised by you or the Privacy Act.

If you provide any personal information about anyone else to us, you confirm that you have collected that personal information in accordance with the Privacy Act and that the individual concerned has:

- authorised the disclosure to us and the collection, use and disclosure of their personal information by us in accordance with this Privacy Policy; and
- has been informed of their right to access and request correction of their personal information.

8. Updating your personal information

We will generally rely on you to ensure the information we hold about you is accurate. If any of your details change, please let us know as soon as possible by contacting us.

9. Who do we disclose your personal information to?

We may disclose your personal information to the following people if we consider it necessary to do so for the purposes described in section 6 above:

- NZFSG and its related bodies corporate;
- Product Providers and other prospective lenders, third parties or other intermediaries in relation to your finance or insurance requirements (including a prospective lender's mortgage insurer (if any), any person with whom a lender or insurer proposes to enter into contractual arrangements, any person who provides a guarantee or security and any trustee and any assignee or potential assignee of a lender's or insurer's rights);
- our referral partners who can help you with other services;
- contractors or service providers;
- investors, or any entity that has an interest in our business or any entity to whom we consider assigning or transferring any of our rights or obligations or selling all or part of our business;
- anyone who we are legally required or authorised to share your information with, including regulators and government agencies;
- to auditors (such as NZFSG) to ensure we are providing services to you that are in your best interests, and in accordance with current regulations;

- your employer and referees, as well as credit reporting and identity verification agencies; and
- any other person or entity authorised by you or the Privacy Act.

You acknowledge and agree that credit reporting agencies may hold your credit information (including default information) on their systems and use such information to provide their credit reporting services, which may include providing your credit information (including default information) to their customers.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that the person or organisation has a commitment to protecting your personal information at least equal to our commitment.

10. Do we disclose your personal information to anyone outside New Zealand?

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside New Zealand.

We may also disclose personal information to NZFSG and its related bodies corporate, and third party suppliers and service providers located overseas for some of the purposes listed above.

11. Are you required to provide personal information to us?

You are not required to provide any personal information to us but if you choose not to it might affect our ability to provide services to you and your ability to obtain finance, insurance and other Products from Product Providers.

In most circumstances it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

12. Access and correction to your personal information

You may access and request correction of any of the personal information that we hold about you at any time by contacting us. We may charge a fee for our reasonable costs of retrieving and supplying the information to you.

13. Further information

If you have any questions on our Privacy Policy or your personal information please contact us.

This Privacy Policy was last updated on **March 2021.**