

Privacy Policy

We (The Financial Fitness Group New Zealand Limited - TFFG) recognise the importance of protecting your privacy and are committed to safeguarding your information.

1. INTRODUCTION

1.1 Overview: This Privacy Policy explains how we may collect, hold, use and disclose information that identifies you (your **personal information**). If you would like to contact us in relation to this Privacy Policy or our use of your information, please email us at the details set out in the Contact us section below.

1.2 Application of this Privacy Policy: Please read this Privacy Policy carefully. It applies to any personal information that you provide to us or authorise us to collect. By accessing our website at www.enable.me or www.moneyfit.me or www.property.enable.me (our **websites**) or otherwise providing us with personal information, you authorise us to collect, use and disclose your personal information in accordance with this Privacy Policy.

1.3 Updates to this Privacy Policy: We may update this Privacy Policy at any time by posting an updated version of this Privacy Policy on our website. The updated version of this Privacy Policy will take effect immediately upon such notice. We may also take additional steps to bring the changes to your attention, including by notifying you directly. We will update you of any material changes as required by law.

1.4 Additional rights and obligations: This Privacy Policy applies in addition to, and does not limit, our rights and obligations under the Privacy Act 2020 (as amended or replaced from time to time) (**Privacy Act**) or any specific authorisation that you provide to us when you interact with us.

2. WHO WE ARE

2.1 Your personal information will be held by The Financial Fitness Group New Zealand Limited at Level 4, 165 The Strand, Parnell, Auckland, New Zealand (the **Manager**) as manager References to **TFFG** or **we, us** or **our** in this Privacy Policy include the Manager.

3. COLLECTION OF PERSONAL INFORMATION

3.1 Types of personal information we collect: The personal information we collect will depend on your interaction with us. The personal information we commonly collect includes:

- **Contact details:** such as name, title, address, telephone number, e-mail address
- **Details for application:** information in addition to the contact details that are required for the purposes of certain legislative and regulatory requirements such as Anti-Money Laundering and Countering Financing of Terrorism Act 2009, (including IRD number, source of wealth and entity details).
- **Marketing:** details of your marketing preferences
- **Enquiry details:** details of enquiries you make (e.g. by completing a form on our website) and other communications you have with us
- **Feedback:** details of any feedback or comments that you provide on us directly or to a third party or our website or social media channels
- **Technical information:** this includes information that we may collect when you access or use our website (e.g. IP address, browser type, cookie information).

You are not required to provide us with any personal information that we request. However, if you do not do so, we may not be able to provide you with certain information that you have requested. We will let you know if this is the case.

3.2 How we collect personal information: Generally, we collect personal information directly from you. We may also collect your personal information from a third party if you have authorised them to provide, or authorised us to collect, that information. For example, we may collect information about clients from the IRD and AML check providers. In addition, we may collect information about you and your use of our website using automatic data collection tools. These tools collect certain standard information about your access and computer, such as your browser type, operating system and language, access times and your Internet Protocol (IP) address.

3.3 Cookies: We may also collect information through cookies on our website. Cookies are small pieces of information that are stored on a user's device. We may use cookies to personalise your experience on the website, make it easier for you to navigate our website, and improve your experience by storing your search and session information. Cookies can be disabled via your web browser; however, doing so may limit your access to some of the websites' content and features. We may also use cookies to track non-personally identifiable information such as usage and volume statistics, for research purposes to further develop our website.

3.4 Information about other people: If you provide us with, or authorise us to collect, personal information about another person, you confirm that they have authorised you to provide us, or authorise us to collect, their personal information in accordance with this Privacy Policy and that you have informed them of their rights to access and request correction of their personal information, as set out below.

4. USE OF PERSONAL INFORMATION

4.1 How we may use your information: We may use your personal information for the following purposes:

- for the general operation of TFFG and to manage our relationship with you (including management of your client profile, to notify you of changes to our website, terms and conditions, and respond to queries or complaints)
- to provide you with marketing and updates that you have requested or that we think you might be interested in (e.g. via newsletters or other marketing materials) unless you have opted-out of such marketing
- to comply with our legal obligations and policies
- to ensure the security of our networks and systems, protect against, identify and prevent fraud and other claims
- to analyse your use of our website, personalise and improve your experience on our website using cookies and similar technologies
- to facilitate our internal business operations (including for training, risk management and for developing, maintaining and testing our IT systems and infrastructure)
- for any other purpose authorised by you or permitted by law.

4.2 Use of aggregated and anonymous information: We also use aggregated and anonymous information (where identifiable characteristics are removed, so that you will remain anonymous) for statistical and research purposes.

4.3 How we may communicate with you: We may communicate with you by email and other electronic means.

5. DISCLOSURE OF PERSONAL INFORMATION

5.1 How we may share your information: We may share your personal information for the purposes set out above with the following parties:

- our related companies and organisations, partners, contractors and service providers (including IT services providers), to assist us with the operation of our business;
- authorities, regulators and professional advisers (including lawyers, bankers, auditors and insurers);
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets;
- any other party authorised by you or to whom we are required or authorised to disclose personal information in accordance with applicable law.

6. SECURITY AND STORAGE

6.1 Security: We take reasonable technical and organisational security measures to prevent loss or unauthorised access, use, alteration, or disclosure of personal information you provide to us or authorise us to collect. We also require any contractors or service providers who require access to your information required to implement reasonable technical and organisational security measures to protect your information.

6.2 Inherent risks: Unfortunately, the transmission of information via the Internet is not completely secure. Although we will apply our normal procedures and comply with legal requirements to protect your information, we cannot guarantee the security of your information transmitted to or from the website and any transmission is at your own risk.

6.3 Links to third party websites: The website may from time to time contain links to and from other websites. If you follow a link to any of those sites, please note that those sites ought to have their own privacy policies and that we do not accept any responsibility or liability for those sites or for their privacy policies. Please check those privacy policies before you submit your information to those sites.

6.4 Login details: If, from time to time, you have a username, password or other login detail which enable you to access certain portals, you must not allow any other person to use them and must treat them as confidential. If you believe or suspect that someone else knows your login details, you must contact us using the email address set out under the Contact us heading below as soon as possible.

7. ACCESS AND CORRECTION OF PERSONAL INFORMATION

7.1 Your rights: Under the Privacy Act, you have the right to access and request correction of any personal information that we hold about you. Please refer to the Contact us section below.

8. CONTACT US

8.1 How to contact us: If you have any questions or requests relating to this Privacy Policy or personal information that we may hold about you, please contact us by emailing privacy@enable.me

8.2 Address: enable.me Level 4, 165 The Strand, Parnell, Auckland 1010. PO Box 42073, Orakei, Auckland 1745

WEBSITE CONTENT

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CONTACT US

Should you have any concerns about your privacy contact:

enable.me

Level 4, 165 The Strand, Parnell, Auckland 1010

PO Box 42073, Orakei

Auckland 1745

Attention: Complaints

email: privacy@enable.me

THIRD PARTY PROVIDERS

As part of the delivery of our services we may engage the service of third-party providers. The collection and storage of your information by those parties is governed directly by their privacy policies.

Pocketsmith - <https://www.pocketsmith.com/legal/privacy-policy/>

Consilium - <https://www.consilium.co.nz/privacy-policy>