

# External Privacy Policy

Gisborne Investment Services Ltd

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<b>Policy owner</b>	Matthew Pierard
<b>Approver</b>	Gisborne Investments Services Ltd
<b>Review time frame</b>	Annually
<b>Next review date</b>	1 December 2027

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## Document History

Version	Date	Amendments
V1	19/08/2022	Updated to reflect Privacy Act 2020
V2	15/04/2026	Updated to reflect IPP3A
V3		

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## Purpose

We understand that how we collect, use, disclose, and protect your personal information matters to you. Protecting your information and being transparent about our practices is a vital part of our relationship with you.

This Privacy Policy explains how Gisborne Investment Services Ltd complies with the New Zealand Privacy Act 2020 (“the Privacy Act”) when managing personal information collected from clients and users of our digital platforms.

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## Consent to Privacy Policy

By contacting us through our website or social media pages, you agree to this Privacy Policy. If you do not agree, please contact us by phone instead of using our digital platforms.

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## Collection of Personal Information

Personal Information is defined as information about an identifiable natural person.

## Types of Personal Information We Collect

We only collect personal information that is necessary. Where reasonable, we collect information directly from you and make it clear when collection occurs.

## Indirect Collection of Personal Information

We may collect personal information about you indirectly where it is not reasonable or practical to collect it directly from you. This may include information provided by third parties, publicly available sources, service providers, Individuals who interact with us on your behalf or through your interactions with our website or digital services.

When we collect information indirectly, we take reasonable steps to ensure you are aware of the collection and the purposes for which the information will be used, as required under the Privacy Act 2020.

Examples of when we collect information:

- **When you interact with us directly** — for example, when you contact us (When you phone, email, or write to us, complete a form, request a service, make a payment, or communicate with our staff. During phone or video calls (Microsoft Teams, Zoom, Skype)
- **When you use our website or digital services** — including analytics data, cookies, IP addresses, and information about how you navigate our online platforms.
- **When someone acts on your behalf** — such as a family member, authorised representative, employer, or support person providing information for you.
- **When we receive information from third-party service providers** — including payment processors, identity verification services, referral partners, or contractors who assist us in delivering our services.
- **When we access publicly available sources** — such as public registers, social media profiles, or information published online.
- **When required for compliance or verification** — for example, confirming your identity, checking eligibility, or meeting legal or regulatory obligations.
- **When another organisation shares information with us** — such as government agencies, community partners, insurers, or businesses we work with to provide services to you.
- **When you attend our premises or events** — including CCTV footage, visitor logs, or registration details.
- **When we collect information automatically** — such as security logs, device information, or data generated by tools that support our operations

Types of information collected may include:

- Name
- Date of birth
- Contact details
- Details relating to your use of our products or services
- Details of your enquiry
- Subscription or communication preferences

We may also collect information from:

- Publicly available sources

- Your professional advisers (e.g., accountant, solicitor) — with your express consent

We are not responsible for the privacy practices of these third parties.

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### **Online Device Information and Cookies**

When you visit our website or social media pages, we collect information using cookies. Cookies help us understand your visit and improve your experience.

Information collected may include:

- Date and time of visits
- Pages viewed
- Referring website
- Navigation behaviour
- Location information
- Device information
- IP address and browser type

We will never ask you to publicly share personal information on social media. If needed, we may invite you to send details privately.

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### **Purpose of Collection and Use of Personal Information**

Your personal information may be used to:

- Assess eligibility for our products or services
- Facilitate services
- Provide requested information
- Provide information about other products or services

We may also maintain information for regulatory disclosure obligations.

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### **Storage and Protection of Your Personal Information**

We store personal information electronically and in paper files. We take reasonable steps to keep your information secure.

Security measures include:

- Identity and access management controls
- Secure buildings and physical access controls
- Employee confidentiality and security training

- Secure arrangements with service providers
- Regular compliance reviews

We retain information only as long as required by law or business needs.

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### Cloud-Based Service Providers

We use third-party providers to store and process information, including:

- **Google Drive** – file hosting
- **Solve360** – CRM system
- **MailChimp** – email marketing platform

We ensure these providers maintain appropriate security and confidentiality standards.

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### Timeframes for Keeping Personal Information

We destroy or de-identify personal information when it is no longer required.

Information relating to advice services must be retained for **seven (7) years** after an account is closed, unless still relevant.

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### If There Is a Privacy Breach

If a breach occurs that may cause serious harm, we will:

- Secure the breach
  - Assess the severity
  - Notify authorities if criminal activity is suspected
  - Notify affected individuals where appropriate
  - Notify the Privacy Commissioner
  - Review and improve internal processes
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### Disclosure of Your Personal Information

We may disclose your information where:

- Necessary to fulfil the purpose of collection
- Required or authorised by law
- You have consented
- Permitted under the Privacy Act

### Parties We May Disclose Information To

- Outsourced service providers (e.g., auditors, compliance reviewers)
- External dispute resolution services
- Regulators
- Credit reporting or debt collection agencies

We will not sell your personal information.

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### Sending Your Information Overseas

We may send information overseas to related companies or service providers.

If a country has lower privacy standards, we will take appropriate measures to protect your information or seek your consent.

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### Third-Party Websites

Our website or social media pages may link to external sites. We are not responsible for their privacy practices and encourage you to review their policies.

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### Right to Access, Correct and Delete Personal Information

You may request access to, correction of, or deletion of your personal information.

We may require identification before processing your request. We cannot delete information required for legal or regulatory purposes.

If we refuse your request, we will explain why (unless prohibited by law) and advise how to lodge a complaint.

A reasonable fee may apply for access requests.

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### What Happens If You Do Not Provide Information?

If you do not provide requested information, we may be unable to provide certain services.

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### Changes to This Privacy Policy

We review this policy periodically. The latest version is available on our website or by calling **06 863 2393**.

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### Privacy Policy Queries and Concerns

If you have concerns about how your information is handled, contact us:

**Gisborne Investment Services Ltd**

P O Box 1273

Gisborne 4040

Phone: 06 863 2393

Email: [matt@gisinvest.nz](mailto:matt@gisinvest.nz)

We aim to acknowledge complaints within three working days and resolve them as quickly as possible.

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

**Office of the Privacy Commissioner**

P O Box 10-094

Wellington 6143, New Zealand

Fax: 04 474 7595

Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)

Telephone: 0800 803 909