

# Consilium Privacy Policy

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## 1. Purpose and background

Consilium NZ Limited (Consilium) is committed to protecting your privacy and the security of your personal information. This Privacy Policy (“**Policy**”) describes how we collect, handle, use and disclose your personal information. It also explains how you can access and, if necessary, correct personal information we hold about you.

## 2. What is personal information?

For the purposes of this Policy, Personal Information is any piece of information that relates to a living, identifiable person. Personal Information includes, but is not limited to, your name, contact details or financial details.

## 3. Who Consilium collects personal information about

We may collect personal information about:

- People who visit one of our websites or use our online tools.
- People who apply for or who are provided with access to Consilium Wrap (Account Holders).
- People who are appointed by an Account Holder to have access to their Consilium Wrap account (for example, an accountant or other representative).
- Financial advisory firm staff, who may provide services to Account Holders, or who may be users of another Consilium service.
- Service providers or suppliers.
- Other third parties with whom we come into contact.

## 4. What kind of personal information does Consilium collect and hold?

We collect personal information about you when:

- You visit one of our websites
- You apply for access to Consilium Wrap
- You use our products or services, including our online tools
- You contact us
- You deal with us in some other way

The information we collect about you may include:

- Identification information, such as your name, address, contact details and date of birth
- Bank account details
- Tax related information, such as your IRD number and information about your tax residency status
- Information and documents required to verify your identity and other personal information
- Financial and transaction information
- Information about your interactions with us, including information about any queries or complaints you make



- Any other information that you provide to us or that we obtain from a person acting on your behalf (such as your accountant or financial adviser)

We may also collect personal information about you when you or a person acting on your behalf engages with us, including when we provide you with access to Consilium Wrap or you use any of our other products or services.

## 5. For what purposes does Consilium collect, hold, use and disclose your personal information?

The main purpose for which we collect, hold, use and disclose your personal information is to facilitate the provision of our products and services to you. This includes:

- Checking whether you are eligible for the applicable product or service
- Processing your application
- Verifying your identity
- Providing our products and services to you, and giving you information about our products and services
- Helping to manage and administer the products and services we provide you, including answering your requests and complaints, varying products and services and taking any required legal action
- Allowing us to run our business and perform administrative and operational tasks, such as training staff, developing and marketing products and services, risk management, systems development and testing (including of the Consilium Wrap website), and undertaking planning, research and statistical analysis
- To comply with legislative or regulatory requirements, including under the Financial Markets Conduct Act 2013, the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, and the United States Foreign Account Tax Compliance Act (if applicable)

Personal Information we collect is only shared with authorised people that have a business need for that information and in compliance with our internal policies, including our Confidentiality of Information Policy.

## 6. How does Consilium collect personal information?

We collect personal information directly from you. We may collect your personal information using electronic means (see section 10 for more information). We also collect personal information about you from others. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- Your representatives (including your financial adviser or other representatives)
- Publicly available sources of information
- Your employer (if you are a staff member of an advisory firm)
- Our service providers or other organisations that are involved in providing our products and services to you, including any administrator or custodian you have appointed
- Commercial information service providers, bureaus or other persons that help us verify your identity or help us identify, investigate or prevent fraud or other misconduct

## 7. How does Consilium hold personal information?

Consilium strives to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold, and to protect its privacy and security. Much of the information Consilium holds about you will be stored electronically in secure data centres, which are located in Australia and New Zealand. This does not include third parties backing up or mirroring their data in overseas jurisdictions.



Some of your personal information may be stored in paper files, which will be held securely in Consilium's office.

## **8. Who does Consilium disclose personal information to, and why?**

Consilium may disclose your personal information to external organisations that help us offer our products and services, including our service providers, for the purposes of offering and providing you with those products and services.

These may include:

- The administrator and custodian of Consilium Wrap
- Our agents, contractors and external service providers (for example, information technology service providers)
- Financial services organisations, including brokers, custodians, fund managers and portfolio service providers
- Our legal advisers or auditors
- Your representatives (including, where appropriate, your financial adviser and their staff, legal adviser, accountant, or other representatives)
- Service providers that help us verify your identity or help us identify, investigate or prevent fraud or other misconduct
- External dispute resolution schemes
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event
- We may also disclose your personal information to others where:
  - ▶ Required or authorised by law or regulation or where we have a public duty to do so
  - ▶ When you have expressly consented to the disclosure, or your consent may be reasonably inferred from the circumstances

Our service providers are required to comply with the Privacy Act and only use the personal information we disclose to them for the limited and specific role we ask them to perform.

## **9. Does Consilium use or disclose personal information for marketing?**

We do not use personal information for marketing. We may use aggregated data to help us better understand and market our services.

## **10. Does Consilium collect personal information electronically?**

Consilium collects information from you electronically, for example through our websites, Consilium Wrap and the Consilium Portal. Each time you visit any of our websites or online tools, we collect information about your use of the website or tool, which may include the following:

- The date and time of visits
- Pages viewed
- How you navigate through the site and interact with pages (including fields completed in forms and applications completed)
- Location information
- Information about the device used to visit the site
- IP addresses



We use technology called cookies (which allow us to track your use of our websites and platforms) whenever you visit one of our websites. Cookies are used to identify your visit to our websites, allowing us to identify you the next time you visit and to provide you with a more meaningful experience.

Cookies enhance our ability to offer secure and reliable services online. The cookies we send to your computer cannot read your computer's hard drive, obtain any information from your browser or command your computer to perform any action. Cookies are designed so that they cannot be sent to another site or be retrieved by any other website.

## **11. Access to and correction of personal information**

You have a right to seek access to your Personal Information and, if necessary, request corrections to it. There are some circumstances in which we are not required to give you access to your personal information.

- If we refuse your request for access to, or to correct, your personal information, we will explain why, unless it would be unreasonable to do so.
- 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.

Please also advise us if you believe that any information we hold about you has changed, so we can ensure that all information we hold about you is accurate, complete and up to date.

## **12. Retention of personal information**

How long we hold your personal information for will vary. The retention period will be determined by the following:

- The purpose for which we are using your personal information – we will need to keep the information for as long as is necessary for that purpose; and
- Legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.

If personal information is no longer needed, then it is destroyed or disposed of in a secure manner.

## **13. Changes to this Privacy Policy**

We may change this Policy from time to time. If so, we will publish the updated Policy and notify you if you have a login to any Consilium system.

## **14. How to contact us**

You can contact Consilium's Privacy Officer at:

Email: [privacy@consilium.co.nz](mailto:privacy@consilium.co.nz)

Post: PO Box 1106, Christchurch, 8140