

## Our Privacy Statement

Stewart Group takes your privacy and protecting your data seriously. We are also bound by the New Zealand Privacy Act 2020, where the privacy principals of the Act govern how we collect, use, hold and disclose your personal information.

### What information do we collect?

Stewart Group collect information regarding your identity, address and financial situation. We are obligated under the Anti-money Laundering and Countering Financing Terrorism Act 2009 to confirm your identity information, your address and in some situations your applicable financial assets. If this information is withheld, we are unable to enter into a business relationship with you.

### Why do we collect personal information?

The personal information you provide to us will be collected and held by Stewart Group and its subsidiaries in order to provide you with financial advice relevant to your situation and to meet our obligations with the relevant laws, rules and regulations.

For record and training purposes, we may record our phone calls, meetings and video conference calls.

### Who do we disclose your information to?

In order to provide you with our services, Stewart Group must disclose relevant information to Finzo NZ Limited (our financial advice licence holder), our service providers, affiliated persons and any regulatory or governmental authorities or court to the extent to which such disclosure is required to be made by applicable law or court order. Our auditors may also review any information held by us about you.

### Requesting a copy of your information

You have the right to ask for a copy of any personal information we hold about you and ask for it to be corrected if you think it is wrong. If you'd like to request a copy of your information, or have it corrected, please contact us on 0800 878 961. We will provide you with access to this information within 20 working days.

We are unable to delete your records that we are required under any law to retain.

### Retaining your personal information

Stewart Group is obligated under a number of laws to retain your personal information.

It is our policy to retain client files for as long as legally possible, as it provides the record of advice we have provided. All files will be retained for a minimum period of 7 years after any recommended product or platform has ended, unless legally required to be kept for longer.

We also manage an annual destruction process of past client files. If your client file no longer needs to be retained, it will be confidentially destroyed.

## Keeping your data secure

At Stewart Group we take every measure to keep your data safe. We outsource our IT security to a trusted professional in this field. They use the best IT security on the market and are constantly reviewing the latest developments in this area.

## Visitors to our Website

Stewart Financial Group is committed to honouring the privacy of visitors to our website. By using our website and/or client portal you are considered to have accepted our policy and any future updated policy. Our website uses the following methods to collect your information for internal research, marketing and understanding user preferences:

- Email addresses - we will only record your email address if you subscribe to any of our services. It will only be used for the purpose for which you have provided it. We will not use your email address or any of your personal details for any other purpose without your consent and we will not disclose your email address without your consent. Electronic mail submitted to Stewart Financial Group is handled and saved according to the provisions of the New Zealand Privacy Act 2020.
- Clickstreams – these are the paths a user takes when navigating a web page or the internet in general. When you visit our website, our Internet Service Provider makes a record of your visit and logs the following information for statistical purposes - the user's assigned IP address, the user's top level domain name (for example .co.nz, .gov, .com.au, .uk etc), the data and time and duration of visit to the site, and the type of browser and operating system used.
- Cookies - a cookie is a short piece of data that is sent from a web server to a web browser on the user's machine when the browser visits the server's site. The cookie is stored on the user's machine, but it is not an executable program and cannot do anything to your machine. Whenever a web browser requests a file from the same web server that sent the cookie, the browser sends a copy of that cookie back to the server along with the request. In this way, the server knows you have visited before and can co-ordinate your access to different pages on its website. A server cannot find out a name or email address, or anything about a user's computer, by using cookies.

We can make changes to our Privacy Statement from time to time, and this will be available on our website. It is your responsibility to check this information.

If you have any questions about this Privacy Statement or your personal information, please contact Stewart Group on 0800 878 961.