



First NZ Properties Limited

Privacy Policy

1 Introduction

- 1.1 First NZ Properties Limited, and its related entities ('FNZ', 'we', 'us', and 'our') are committed to protecting and respecting your privacy and complying with applicable privacy laws.
- 1.2 This Policy sets out how and what personal information is collected, used, stored, and disclosed in relation to your relationship with FNZ. **Personal Information** means information about an identifiable individual, as defined in the Privacy Act 2020 (**Privacy Act**).
- 1.3 This Policy may change from time to time. When we change this Policy, we will update it on our website. By using our website, or providing personal information, after we have changed this Policy, you acknowledge and accept this Policy, as amended.

2 What Personal Information we collect

- 2.1 We may collect Personal Information such as an individual's:
 - 2.1.1 full legal name,
 - 2.1.2 date of birth,
 - 2.1.3 driver's licence number,
 - 2.1.4 passport number,
 - 2.1.5 marital status,
 - 2.1.6 postal or residential address,
 - 2.1.7 email address,
 - 2.1.8 telephone number,
 - 2.1.9 nationality,
 - 2.1.10 bank account details,
 - 2.1.11 taxation details.
- 2.2 We collect Personal Information for the purposes set out in clause 4 (Purposes of collection)

3 How we collect the Personal Information

- 3.1 The Personal Information that we collect may be collected through various means, including:
- 3.1.1 through forms completed by you or in other communication with FNZ such as by phone, email or post;
 - 3.1.2 through your use of FNZ's website or any other website related to FNZ including that of any third party which provides services to FNZ, such as FSS Management Limited (**FSS**) or Syndex Limited (a third-party secondary market service provider (**Syndex**)); or
 - 3.1.3 from other individuals or companies.
- 3.2 If you provide us with Personal Information about someone else, you must make sure that you are authorised to disclose that information to FNZ and that, without FNZ taking any further steps required by applicable data protection or privacy laws, we may collect, use, store and disclose such information for the purposes described in this Policy.
- 3.3 With reference to the above clause 3.1.2, you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their Personal Information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, our identity, and how to contact us. You agree to assist us with any requests by the individual to access or update the Personal Information you have collected from them and provided to us.

4 Purposes of collection

- 4.1 The purposes for which Personal Information may be used by FNZ inside and outside New Zealand include:
- 4.1.1 as required by law;
 - 4.1.2 in connection with the operation of our business, including:
 - (a) as required to discharge our duties to you as a shareholder of FNZ;
 - (b) for our own internal business purposes;
 - (c) to provide promotional information and material in hard copy or electronic form, or information we believe may be of interest;
 - (d) to communicate with shareholders, potential shareholders, suppliers, employees, contractors and other third parties;
 - (e) as required by Syndex to:
 - confirm your identity and address (including electronically matching the information with identification information in third party databases);
 - undertake customer due diligence;
 - provide you with the use of, and information about, Syndex's other products and services and products and services;
 - to enable Syndex or its related companies (whether incorporated or constituted in New Zealand or elsewhere) to comply with regulatory

requirements,

- (f) as required by any other third party that provides services to FNZ (including business associates, contractors, agents or service providers); and
- (g) to comply with our legal obligations, and to meet our reporting obligations as required by law.

4.1.3 purposes directly related or incidental to the above; or

4.1.4 for any other purpose authorised by you or permitted by law.

5 Information collected on our websites

5.1 When you access our websites, our web hosting provider may make a record of the visit and log the following information for statistical purposes:

5.1.1 your IP address;

5.1.2 the date and time of visits to the website;

5.1.3 the number of, and pages viewed;

5.1.4 the referring site (if any) through which you clicked through to this website;

5.1.5 technical information on browser connections.

5.2 This statistical information is anonymous and no attempt is made to identify users or their individual browsing activities. An exception is in the event of an investigation, where a law enforcement agency may exercise a warrant to inspect a web hosting provider's server logs.

6 Disclosure of the Personal Information

6.1 We will only disclose your Personal Information in accordance with this Policy and the Privacy Act.

6.2 We may provide Personal Information to third parties where necessary or appropriate to facilitate the purpose for which information was collected pursuant to this Policy.

6.3 We may disclose your Personal Information to Government entities and other external data providers that hold information about you in order to verify that the information provided by you is consistent with the records held by such entities for the purpose of complying with our legal obligations.

6.4 We may disclose Personal Information where we are required to do so by law, court order, subpoena or other legal process, including investigation by tax authorities or law enforcement authorities. Where possible and appropriate, we will notify you if we are required by law to disclose your Personal Information.

6.5 We will not otherwise disclose your Personal Information to a third party unless you have provided your consent.

6.6 Personal Information may be disclosed between FNZ's related entities and our personnel and those of our agents or delegates. Those related companies, personnel, agents and delegates will treat and handle such Personal Information in a manner consistent with this Policy and applicable laws.

- 6.7 You agree and acknowledge that any overseas recipients of your Personal Information will be subject to the privacy laws of their local jurisdiction. These overseas privacy laws are likely to be different to the Privacy Act 2020 and the information privacy principals set out in the Act. Overseas recipients may not be required to protect your Personal Information in a way that provides comparable safeguards to those in your own jurisdiction and you may not be able to seek redress in the relevant overseas jurisdiction in relation to breaches of your privacy. You acknowledge and agree to such international data and information transfers with respect to Personal Information of the nature described in clause 2.1.

7 Security and protection of the Personal Information

- 7.1 We store Personal Information that is in electronic form on secure servers.
- 7.2 We may provide your Personal Information to third parties contracted by us in order to perform data storage and data processing services on our behalf. We will take all reasonable steps to ensure that these third parties comply with our instructions and do not use your Personal Information for any other purpose.
- 7.3 Unfortunately, the transmission of information via the internet is not completely secure. Once we have received your Personal Information, we will use all reasonable procedures and security features to try to protect your Personal Information from misuse, loss, disclosure, and unauthorised access. However, by providing us with your Personal Information over the internet you acknowledge that the provision of that information is at your own risk, and that we cannot guarantee the security of such Personal Information

8 Where we store the Personal Information

- 8.1 The intended recipient of your Personal Information is FNZ or those other parties as described in clause 4.1.
- 8.2 We may store your Personal Information on servers and services both within New Zealand and offshore (including third party cloud-based services and storage).
- 8.3 We may access and use that Personal Information in and outside New Zealand.

9 Retaining the Personal Information

- 9.1 We only retain Personal Information for so long as it is necessary for the purposes for which the information can lawfully be used, including if FNZ is required to obtain such Personal Information by applicable laws.

10 Your consent and rights

- 10.1 By providing Personal Information to FNZ, you consent to the collection, storage, use, and disclosure of your Personal Information as outlined in this Policy.
- 10.2 Under the Privacy Act, you have the right:
- 10.2.1 to check whether FNZ holds your Personal Information and to request access the Personal Information held by FNZ; and
 - 10.2.2 to request FNZ to correct as soon as reasonably practicable any Personal Information relating to you that is inaccurate.
- 10.3 It is your responsibility to let us know if the Personal Information which we hold about you needs to be corrected or updated.

- 10.4 In accordance with the Privacy Act, FNZ has the right to and may charge a reasonable fee for processing or responding to any request to access or correct Personal Information.

11 Data Breaches

- 11.1 In the event that personal information has been lost or subject to unauthorised access, misuse, interference, or disclosure, we will take steps to contain and rectify the data breach, as soon as practicable, prevent reoccurrence, and comply with any applicable notification obligations.

12 Contacting us and complaints process

- 12.1 If you have any questions about the privacy or security of your Personal Information, would like to request access to or correction of your Personal Information, or if you have a concern about a breach of privacy or a privacy complaint, please contact FNZ's privacy officer here: info@fssmanagement.co.nz.
- 12.2 FNZ will deal with any privacy complaint(s) by investigating the complaint(s) and will aim to provide a response to the complainant within 20 working days, provided that we have all necessary information and have completed any investigation required. In cases where further information, assessment or investigation is required, FNZ will seek to agree alternative time frames with you.