



Springs Road Property Limited

Privacy Policy

1 Introduction

- 1.1 FSS Management Ltd, and its related entities First NZ Limited, Superstore Properties Limited and Springs Road Property Limited, ('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 FSS Management Limited. **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:
 - a. full legal name,
 - b. date of birth,
 - c. driver's licence number,
 - d. passport number,
 - e. postal or residential address,
 - f. email address,
 - g. telephone number,
 - h. bank account details,
 - i. 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 forms that are completed by individuals or in other communication with us such as by phone, email or post.

- 3.2 Through your use of our website and or forms, we may collect information from one individual about another individual. If you provide us with Personal Information about someone else, you must make sure that you are authorised to disclose that information to us and that, without us 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 3.2, 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.
- 3.4 Where requested to do so by 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 us inside and outside New Zealand include:
- a. as required by law;
 - b. in connection with the operation of our business, including all relevant purposes including as required by Syndex so as to make the share transfer platform available and the other purposes incidental to this: or
 - c. purposes directly related or incidental to the above; or
 - d. 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:
- a. your IP address;
 - b. the date and time of visits to the website;
 - c. the number of, and pages viewed;
 - d. the referring site (if any) through which you clicked through to this website;
 - e. 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 authority. Where possible and appropriate, we will notify you if we are required by law to disclose your Personal Information.
- 6.5 The information may also be used by Syndex, the transactional platform for the transferring of shares. Syndex may also use the information between their related companies, agents and other third parties that provide services to them and any other party authorised by them.
- 6.6 We will not otherwise disclose your Personal Information to a third party unless you have provided your consent.
- 6.7 Personal Information may be disclosed between our 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.

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 FSS Management Ltd and/or its related entities.
- 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 we are required to obtain such Personal Information by applicable laws.

10 Your consent and rights

- 10.1 By providing Personal Information to us, 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:
- a. to check whether we hold your Personal Information and to request access the Personal Information held by us; and
 - b. to request us to correct as soon as reasonably practicable any Personal Information relating to them 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, we have 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, or 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 our privacy officer here: Privacy Officer, Info@fssmanagement.co.nz, or +64 3 539 6000.
- 12.2 We 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, we will seek to agree alternative time frames with you.