

Simplify is committed to protecting the privacy of the information we hold about each of our customers, including your personal information and credit related information. We will comply with the New Zealand Privacy Act 2020, that governs how we collect, use, hold and disclose your personal information, and how we ensure it is accurate and secure.

What is personal and credit related information?

Personal information is any information or opinion about you, that identifies you or from which you can be reasonably identified. Personal Information as defined in the New Zealand Privacy Act 2020 (the Privacy Act), means all information about an identifiable individual (a natural person, rather than a company or other legal entity). Credit related information includes identification information as well as information about your current financial and credit situation, and history.

Consent

Please note that when you contact us through our digital platforms, you are agreeing to our privacy policy, including but not limited to our website, online application and social media. Should you wish to obtain further information about your privacy before using these services please contact us on 0800 001 561.

Information collected

We have a legal obligation to ensure any credit services we assist you with are not deemed unsuitable for you. As a Simplify customer, we will collect personal information from you in order to allow us to provide services to you, which includes assisting you to obtain credit suitable for your purposes and to meet your objectives, through our panel of lenders.

This will allow us to:

- Make reasonable enquiries about your borrowing needs and objectives
- Make reasonable enquiries about your financial circumstances and;
- Take reasonable steps to verify the details of your financial situation and identify.

Any personal information will be collected directly from you, unless you have authorised us to collect that information from another party (for example, a credit reporting agency).

When we collect personal information from you, we will make clear the ways in which we may use or disclose that information, and will ask for your authorisation to do so. You do not have to provide us with information we request, however it may affect the services we can provide to you.

How we protect and store your information

We may electronically record and store your personal information which we collect from you. This may include engaging a third party to provide services relating to the security and storage of that information. We will take all practicable steps to safeguard your personal information and prevent unauthorised disclosure. You should notify us immediately if you feel your personal information has been compromised in any way, to assist us in preventing unauthorised disclosure. We will not continue to store personal information when it is no longer required for any of the purposes for which it may be used.

Use of information

We have controls in place to ensure that your personal information will be used only for the purposes for which it was collected and purposes which you have authorised.

Generally, these purposes will be:

- to consider providing you with credit or other services;
to administer and develop our business (and the of our Lenders), including administering and monitoring any agreement with you;
- to register security interests;
- to comply with laws, rules or regulations (including identity verification requirements) in New Zealand or overseas, including any laws, rules or regulations that we reasonably expect to be put in place;
- for direct marketing purposes;
- to assess your creditworthiness;
- to exercise our rights and fulfil our obligations under any agreements with you or at law; and
- generally to do business with you.

Unless you inform us that you do not wish to be contacted by us, we may use your personal information to contact you, including by mail, email and telephone (including SMS) to provide you with information about and discuss other products or services provided by selected third parties (lenders and Insurers) in which we think you may have an interest. We will not use or act on any of your personal information without taking reasonable steps (having regard to the purpose for which the information will be used) to ensure that the information is accurate, up to date, complete, relevant, and otherwise not misleading.

If we believe that your information is inaccurate, not up to date, incomplete, irrelevant or otherwise misleading, we will ask you (or, with your consent, another person or organisation) to verify that information before we use it.

How we protect your information

We may electronically record and store your personal information which we collect from you. This may include engaging a third party to provide services relating to the security and storage of that information. We will take all practicable steps to safeguard your personal information and prevent unauthorised disclosure. You should notify us immediately if you feel your personal information has been compromised in any way, to assist us in preventing unauthorised disclosure. We will not continue to store personal information when it is no longer required for any of the purposes for which it may be used.

Use of information

We have controls in place to ensure that your personal information will be used only for the purposes for which it was collected and purposes which you have authorised.

Generally, these purposes will be:

- to consider providing you with credit or other services;
- to administer and develop our business (and Heartland group's business), including administering and monitoring any agreement with you;
- to register security interests;
- to comply with laws, rules or regulations (including identity verification requirements) in New Zealand or overseas, including any laws, rules or regulations that we reasonably expect to be put in place;
- for direct marketing purposes;
- to assess your creditworthiness;
- to exercise our rights and fulfil our obligations under any agreements with you or at law; and
- generally to do business with you.

Unless you inform us that you do not wish to be contacted by us, we may use your personal information to contact you, including by mail, email and telephone (including SMS) to provide you with information about and discuss other products or services provided by the Heartland group, or products and services provided by selected third parties in which we think you may have an interest.

We will not use or act on any of your personal information without taking reasonable steps (having regard to the purpose for which the information will be used) to ensure that the information is accurate, up to date, complete, relevant, and otherwise not misleading. If we believe that your information is inaccurate, not up to date, incomplete, irrelevant or otherwise misleading, we will ask you (or, with your consent, another person or organisation) to verify that information before we use it.

Disclosure of information

As a Simplify customer, you consent to your personal information being disclosed to or obtained from other organisations or people we consider appropriate for the purposes listed above. Those other organisations or people include: our related companies;

- our service providers;
- other financial or insurance institutions;
- government departments, government bodies or agencies in New Zealand or overseas (including tax authorities);
- the New Zealand Transport Agency Driver Check service;
- any organisation or person providing us with guarantees or security under any agreement with you;
- our existing and potential business partners;
- any organisation or person to whom we consider assigning or transferring any of our rights under any agreement with you;
- your employer and accountant; and
- any other organisation or person you authorise your personal information to be disclosed to or obtained from.

In particular, we may use the services of credit reporting agencies on an on-going basis, and may exchange information about you with those agencies (including information about your default and repayment history). Those agencies may retain that information and provide that information to other customers who use their credit reporting services.

We may also disclose your information where that disclosure is permitted under the New Zealand Privacy Act 2020, such as where the disclosure:

- is necessary to facilitate a sale of all or part of a Lenders business; or
- is necessary to prevent a serious or imminent threat to public health or safety;
- is authorised by the Privacy Commissioner;
- is of information which is already publicly available; or
- is of information which is not in a form which identifies you.

Accessing, updating and correcting your information

You have the right to access and request correction of any personal information that we hold about you, and full details of every organisation or person to whom we have disclosed information about you, by contacting Simplify on 0800 001 561.

There are some circumstances in which we are not required to provide your access to your personal information. If we disagree that your information should be corrected, deleted or you are refused access, we will tell you why in writing, except where the law permits us from doing so.

There is no fee for correcting your personal information. In processing your request for access to personal information, a reasonable cost may be charged. This would cover locating, obtaining and supplying the information to you including any fees charged by the lender.

Queries, Concerns or Complaints

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Privacy Act you can contact our Privacy Officer in these ways:

Telephone: 0800 001 561

Email: team@simplify.co.nz

writing to: 9/27 Powell Street, Avondale, Auckland, 1026, New Zealand

- We will acknowledge your complaint within two business days of its receipt
- We will let you know if we need any further information from you to investigate your complaint
- We aim to resolve complaints as quickly and efficiently as possible
- We will strive to resolve complaints within five business days, but in some cases where we need to obtain further detail, this may take a little longer to resolve.

If you are not satisfied with the way we have handled your complaint, you may complain to the Office of the Privacy Commissioner in these ways:

Lodge a complaint on the Privacy Officer website: www.privacy.org.nz

Telephone: 0800 803 909

Email: enquiries@privacy.org.nz

There is no fee for correcting your personal information. In processing your request for access to personal information, a reasonable cost may be charged. This would cover locating, obtaining and supplying the information to you including any fees charged by the lender.

Cookies

Our web service collects the domain names, not the email addresses of visitors. Our web server may require an individual to place a "cookie" (small data file) on a users computer's hard drive, in order to track statistical information about navigation to and throughout certain areas of our website.

Third Party Websites

Through our website and social media pages, you may be able to link to other websites which are not under our control. We do not take any responsibility for the privacy or security practices of those third party websites. We do not accept any liability for any loss suffered by you relying on anything contained or not contained within these website links.

Sending your information overseas

We operate our business both locally in New Zealand and within Australia. Whilst we operate on and offshore, this does not change our commitment to you to safeguard your privacy and your information remains subject to confidentiality obligations.