



## **Top Half Financial Services Limited**

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## **Privacy Policy**

### **Our commitment to protect your privacy**

We understand how important it is to protect your personal information. This document sets out our privacy commitment in respect of personal information we hold about you and what we do with that information.

It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of that information.

Our commitment in respect of personal information is to abide by the Privacy Principles set out in the Privacy Act 1993 (or any successor legislation) (the Privacy Act) and all other applicable laws. This Privacy Policy applies in addition to, and does not limit, our rights and obligations under the Privacy Act and other applicable laws.

### **Who are we?**

References in this Privacy Policy to “we”, “us” and “our” means Top Half Financial Services Limited acting through a Financial Adviser.

### **Your authorisation**

By providing us with personal information, engaging us to provide you with services, or by using our website, you consent to the collection, use, storage and disclosure of personal information in accordance with this Privacy Policy.

### **Changes to our Privacy Policy**

We may change our Privacy Policy from time to time, by publishing an updated version on this page, to reflect changes in the law and also our business needs so long as the changes do not disadvantage you. By continuing to engage us or use our website you will be deemed to have accepted the updated Privacy Policy.

### **What personal information do we collect?**

When we refer to personal information we mean information that identifies, or is capable of identifying you. This includes, for example, your name, date of birth, address, contact details, account details and occupation.

If you engage us to provide services to you, we may collect personal information about your financial situation or goals in order to recommend mortgage and insurance products that we are permitted to advise on (Products).

### **Why do we collect your personal information?**

We collect your personal information for the purposes of our and relevant third parties’ services and relationship with you. This information enables us to:

- Provide Financial Advice (e.g. to enable us to recommend Products to you);

- Liaise with professionals including but not limited to solicitors, accountants, mortgage providers, lenders, insurers and other providers of Products that you choose to apply for when required, at your request,
- If you have insurance, those involved in the insurance process including but not limited to claims investigators, medical practitioners, re-insurers, insurance reference agencies,
- Subscribe you to our newsletters and other email communication (you can opt-out on request)
- Get back to you on a regular basis and follow up on your financial advice needs or circumstances
- responding to your requests or inquiries;
- any other purpose authorised by you or the Privacy Act.

## **Disclosing your personal information**

We may disclose your personal information to and receive personal information from other companies when necessary, in connection with the purposes in "Collecting your personal information" above. Other companies may include government bodies, claim assessors, reinsurers, other insurance companies, mailing houses, claims reference providers, other service providers, hospitals, medical and health professionals, legal and other professional advisers. If you don't provide us with the information we reasonably request we will be unable to consider your application for insurance cover, administer your policy or manage any claim under your policy.

## **How do we collect your personal information?**

Generally we will collect your personal information directly from you. We also collect your personal information if you use the "contact us" functionality on our website and you provide the personal information during conversations between you and us.

We may also collect your personal information from:

- credit reporting agencies;
- with your authorisation, banks (e.g. Bank Statements), employers (e.g. payslips/contracts), medical providers (e.g. medical records);
- Product Providers (e.g. during the term of any loan or insurance we have arranged on your behalf, in order to answer your queries or assist you with your financial arrangements as your circumstances change). If applicable, the Product Providers may also periodically disclose your loan balance or premium to us in connection with the payment of ongoing commission to us over the term of your loan or insurance; and
- any other person authorised by you or the Privacy Act.

## **Access to your personal information**

You can request access to and correction of your personal information by contacting us. The Information Privacy Principles outline circumstances under which we may not agree to allow you access to some or all of your personal information. In these cases, we'll give you a reason for our decision. If there is a cost for providing access to your personal information, we'll let you know.

## **Accuracy of your personal information**

We will take reasonable steps to ensure that any personal information we hold about you is accurate, complete and up-to-date

## **Security**

We will take reasonable steps to protect any personal information we hold about you from misuse, loss or unauthorised access, modification or disclosure. We have information security policies in place for both computer records and for our paper files, which aim to minimise the risk of unauthorised access to your personal information.

When you provide personal information online it is encrypted, so it cannot be read as it is transmitted over the Internet between your browser and our server. The encrypted data is transmitted using a RSA 2048 bit secure socket layer (SSL) connection.

Your information is stored on secure servers that are protected in controlled facilities. We require our employees and data processors to respect the confidentiality of any personal information held by us. Unfortunately, no data transmission over the Internet can be completely secure, so we cannot give an absolute assurance that the information you provide to us via the Internet will be secure at all times. We will not be held responsible for events arising from unauthorised access to your personal information.

Please contact us if you want further information about our security practices. Please notify us immediately if you become aware of any unauthorised use of this website by an Internet user or any other breach of security.

## **Social Media (Features)**

Our Web Site includes Social Media Features, such as the Facebook Like button. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

## **Cookies**

Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. We use cookies to make our website as convenient as possible. Cookies don't personally identify you, but they do identify your browser. Cookies are useful to estimate the number of customers and determine overall traffic patterns through our website. If you don't want to receive any cookies, just set your browser to refuse cookies. This may mean you won't be able to take full advantage of our website.

## **Advertising**

We have implemented and use Google Display Advertising. The Google Analytics feature we have implemented based on Google Display Advertising is re-marketing. This means that if you visit our website but do not make a purchase, and you later visit a website which has advertising space that is part of the Google Display Network, then you may see an advertisement from us on the second website. You can opt-out of Google Analytics for Display Advertising and customise Google Display Network ads using the Ads Preferences Manager.

## **Use of e-mail**

If you send us an e-mail we may keep the content if we consider it necessary to do so. Any personal information in your e-mail, including your e-mail address may be used to help us to provide our services and products. This may mean disclosing personal information about you to third parties outside of Top Half Financial Services, such as to mailing houses. However, we will disclose your personal information only for the purpose of providing our products and services to you.

Please be aware that e-mails are not necessarily secure and if you have concerns about the security of the content of an e-mail then you should consider contacting us by other means.

## **Resolving problems related to your privacy**

If you want to report a suspected breach of your privacy or you don't agree with a decision regarding access to your personal information, please contact us. We have an internal dispute resolution process to address such issues.

If you're not satisfied with our final decision you can direct your complaint to the Privacy Commissioner, either on 0800 803 909 or by mail to P O Box 466, Auckland 1140.