

Privacy Statement

Purpose

Central to the success of Somerset Smith Partners (referred to as "SSP" "our" "we" and "us") is our commitment to our clients. We respect and protect the privacy of the personal information of individuals and entities with whom we deal. We know that it is important that you understand how we collect, use, disclose and protect your information and this Privacy Statement informs our clients and any users of our website about how we look after your information and comply with the requirements of the New Zealand Privacy Act 2020 ("the Privacy Act").

Consent to this Privacy Statement

Please note that when you contact us through our website, you are agreeing to this Privacy Statement. If you do not agree with this Privacy Statement, please do not contact us through our website but call us on 06 835 3126.

Collection of personal information

Personal Information is defined in the Privacy Act as information about an identifiable individual (a natural person as opposed to a company or other legal entity).

Types of personal information we collect and how we collect it

The types of personal information we collect will vary depending on the nature of your dealings with us. We only collect personal information that is necessary. Where reasonable and practicable, we will collect your personal information directly from you and advise you that we are collecting it.

We primarily collect personal information directly from you in the following ways:

- over the telephone when you contact us
- through our website or client portal
- when you email or write to us
- when completing transactions
- at a meeting in person

If it is not obvious that we are collecting personal information from you, we will do our best to make it clear to you so that you are always aware when information is being collected.

Generally, the types of personal information we collect and hold on file include your:

- personal details (e.g. name, address, telephone number, email address and other contact details)
- photo identification and other documents as required to comply with legislation
- bank account number to enable payment to be made to
- tax information such as IRD number, tax rate, and tax residency status
- shareholder identification numbers and security reference numbers

- any additional information you provide us or authorise us to collect as part of providing a particular service

There are times when information may be collected from third parties such as agents, brokers, registries and custodians and service providers including credit reporting bodies and electronic identification verification providers.

If you are an applicant applying for employment at SSP the personal information we collect includes the details contained in a CV, covering letter and other supporting documentation such as written references. This is collected to review the suitability of the applicant.

From other parties who are not our clients (e.g. contractors or people we interact with on a commercial basis) the personal information we collect includes name, email address, contact phone number so we can meet our health and safety obligations.

Reasons we collect your personal information and what it is used for

We collect personal information about you to:

- open an account to allow you to access our services, including verifying your identity and any other person you authorise on your account
- to provide services and administer an account for you including maintaining your contact details
- to enable investment recommendations and the provision of investment advisory services which may include investment reviews to be undertaken (if these services are requested)
- to comply with regulations, laws, licence requirements, court orders and to prevent fraud and other crimes relating to anti-money laundering and the countering financing of terrorism
- inform you of any changes to our Terms and Conditions and other policies that may impact you including this Privacy Statement

If you provide personal information about others

You must ensure you have the consent of the other person if you provide us with their personal information. This means that you must take reasonable steps when providing their personal information that the person concerned is aware of and/or consents to this Privacy Statement.

Using and sharing personal information

We only use and disclose personal information about you for the purpose for which it was disclosed to us or related purposes which would reasonably be expected without your permission including complying with our regulatory obligations.

For example, we may from time to time use your personal information to inform you of investment opportunities or to provide information about products and services that we believe may be of interest to you. However, we do respect your right to ask us not to do this.

We will not sell your personal information to, or share it with, any other organisation or third-party agency, except as permitted by law. We may disclose personal information to intermediaries (such as accountants and solicitors) that you have nominated in connection with our products and services, and we may provide information about you with your express permission.

SSP or a share registry provider we instruct, may also collect information to maintain shareholder information in accordance with stock exchange requirements such as:

- name of the shareholder/s
- personal details of any Power of Attorney (e.g. name, contact details)
- your Shareholder identification numbers
- we may use personal information collected from shareholders for reasons relating to your shareholding such as identity verification, providing shareholder services, sending you correspondence and documents and handling any inquiries or complaints.

We may need to disclose personal information overseas to organisations like agents who buy and sell securities on our behalf for you, and custodians who hold assets on our behalf for you. If your personal information is disclosed we will take steps to ensure your personal information is securely protected consistent with New Zealand laws.

Keeping information accurate and up to date

We take all reasonable steps to ensure that all information we hold is as accurate as is possible. You are able to contact us at any time and ask for its correction if you feel the information we have about you is inaccurate or incomplete and we will correct your personal information, if we are satisfied that it is incorrect.

You can request a copy of the information we hold about you and we will respond within 20 working days.

Keeping information secure and information storage

We hold your personal information in physical and electronic records. Security procedures and technology is in place to protect the information we hold. In addition, records of any transactions, complaints and dealings in person, over the phone or email are maintained. These records are held at our premises and the premises of our service providers which may include storage securely and electronically on Microsoft Azure cloud servers located in Australia and we use Microsoft Office 365 applications.

We take all reasonable steps to ensure the personal information we collect is protected against loss, unauthorised access and disclosure or any other misuse.

Where other organisations provide support services to us, we have in place agreements which requires them to appropriately safeguard the privacy and confidentiality of the information provided to them.

We have an internal retention of documents policy where information that is no longer required to be kept is removed and securely destroyed in line with relevant laws and regulations we are bound by.

Your privacy rights and how to contact us

The Privacy Act gives you rights to request access to and correction of the personal information we hold about you. You may also contact us if you have concerns around the privacy of your information. You can contact our Privacy Officer by:

- Emailing: compliance@somsmith.co.nz
- Calling us: +64 (0)6 835 3126
- Writing to us: PO Box 90, Napier 4140, New Zealand