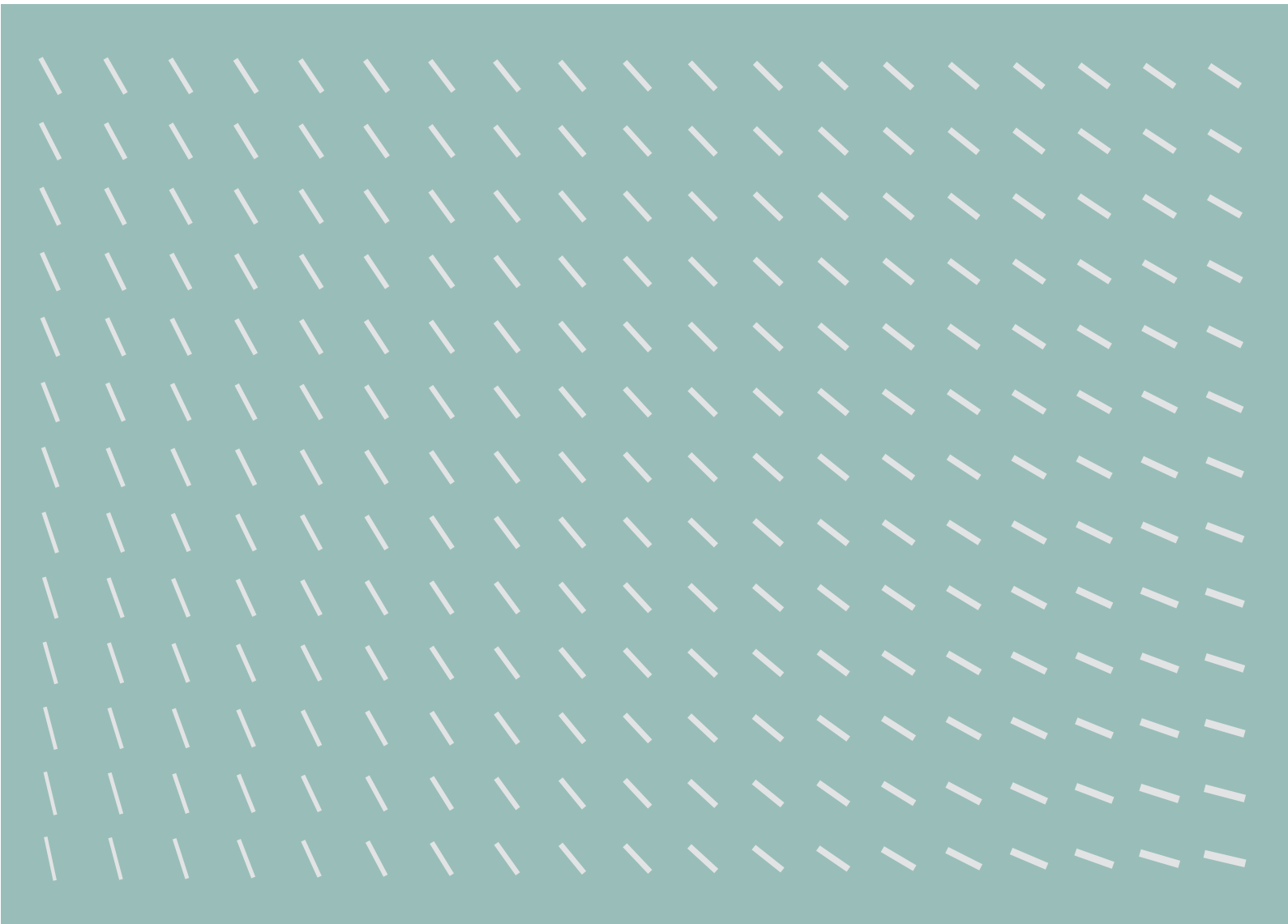




Privacy Policy

5 October 2023



Hobson Wealth – Privacy Policy

At Hobson Wealth, we respect the privacy of the people we deal with and we uphold high standards of privacy practice and security. This policy explains how we handle and manage personal information we collect and/or hold about you. Whenever we handle personal information, we take steps to ensure that appropriate standards of privacy practice and security are applied.

In this policy, “you” and “your” refers to any visitor to our website, our clients and, to the extent applicable, any person authorised in writing to operate a client’s account (**Account**) and a client’s beneficial owners (being any person or entity that has effective control, or owns 25% or more, of a client).

The terms “we”, “us” and “our” refer to Hobson Wealth Partners Limited and its related companies (including Hobson Wealth Custodian Limited).

What personal information we collect, why and what we use it for

For most products and services, it is necessary for us to collect ‘personal information’ (including, without limitation, your name, identity details, photo identification, contact details, transaction information, gender, relationship status, nationality, financial information, information about entities that are associated with you and information about your employment).

The purposes for which we usually collect and use personal information depends on the nature of your interaction with us, but may include:

- to assess and process your account applications;
- to open, administer and operate your account;
- to conduct credit, verification and security checks;
- to provide you products or services or information about our products and services;
- to consider applications and approaches you make to us and carry out your instructions;
- to further our relationship with you, including for our own marketing purposes;
- to maintain your contact details;
- to effect transactions such as the purchase and sale of securities in your name and in connection with your investments in managed investment products and provide related facilities and services, including facilitating settlement;
- to model and test data (in a controlled environment), to develop risk assessments and related analytical tools or for our internal research, development and optimisation of our services;

- to maintain a register of holdings, or to correct information held by share registries or companies about you;
- to fulfil our obligations under applicable laws including, without limitation, laws relating to Anti-Money Laundering and Countering Financing of Terrorism and tax;
- to assess any job application if you apply for a job with us,
- to receive goods and / or services from you;
- to communicate with you about your account application, your complaints or enquiries and any product or service we provide;
- to record any telephone conversations you have with us for the purposes of compliance with applicable laws, verification of instructions and resolving disputes or misunderstandings,
- to provide you with access to our website;
- for the purposes and uses described in any applicable terms and conditions;
- purposes directly related or incidental to the above; and/or
- for any other purpose authorised by you or permitted by law

We may also de-identify your information for our own purposes including market research, new product development and fraud mitigation.

If you do not provide the information, we may not be able to provide products and services to you.

Who we collect personal information from

We collect personal information about you directly from you – this can be in person, in documents you give us, from telephone calls, emails, competitions you enter or from transactions you make.

We may also collect your personal information from third parties, including public sources, your adviser(s), employers (or their affiliates), agents, referrers, brokers, our related companies and service providers (including credit reporting bodies and information service providers).

When you visit our website, we use automated tools and methods to collect information about your visit.

How we hold personal information and keep it secure

We store information in physical and electronic records, at our premises and the premises of our service providers, which may include storage on the cloud. We take reasonable steps and security safeguards to protect personal information against loss, unauthorised use or other misuse.

We maintain security procedures and technology (including internal policies, auditing, training and monitoring of staff) to protect any personal information we hold from any misuse or unlawful disclosure.

Any organisations that provide us with support services are required to appropriately safeguard the privacy of any personal information provided to them. Without limiting the foregoing, we or our service providers may store your personal information using third party cloud-based services and storage, such as Amazon Web Services, subject to appropriate safeguards.

Where the personal information we collect is no longer required, we delete the information or permanently de-identify it in accordance with relevant laws and our records management policy.

Using and sharing your personal information

We may use your personal information for any of the purposes described above.

We may share your personal information with relevant stakeholders within our organisations and:

- any external service providers who provide services in connection with our products and services, including suppliers of administrative services and compliance services (including relating to our Anti-Money Laundering and Countering Financing of Terrorism obligations);
- any platform provider we appoint (including Hobson Wealth Custodian Limited), any trading participant that we appoint to facilitate trades on our behalf (acting as your agent) or any other person (including without limitation any agent of the above) for the purposes of or in connection with providing you our products and services;
- credit reference agencies or service providers to ensure your suitability as a client, to obtain a personal credit and fraud check, to exchange credit information about you or for electronic identity verification;
- the Financial Markets Authority, NZX Limited, New Zealand Clearing Limited, New Zealand Depository Limited, Inland Revenue or any New Zealand or overseas financial market operator, law enforcement agency or regulatory body as required under applicable laws or where we believe the information will help prevent fraud, money laundering or other crimes;
- any financial institution or bank, where required, for the purposes of setting up and administering an account or for the purposes of fulfilling tax obligations;
- any reputable companies or organisations with whom we have a continuing relationship for the purposes listed in this Privacy Policy;
- market research companies to advise you of other products and services or conduct client surveys on our behalf;
- any party proposing to acquire a controlling or material interest in any Hobson Wealth entity to the extent that such personal information is required for the transaction; and
- any other party you authorise.

While we may share personal information with companies that we do business with, we do not sell personal information for marketing purposes to other organisations or allow such companies to do this.

Disclosure of information overseas

We work with service providers, financial market operators, regulatory bodies and other entities overseas. It is likely that your personal information will be disclosed to overseas recipients in other countries, including in Australia.

When we share personal information with parties who operate outside of New Zealand, we take steps to protect personal information against misuse or loss. Unless we have your consent or an exception under the New Zealand Privacy Act 2020 applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the New Zealand Privacy Act 2020 in relation to your personal information.

How you can access or seek correction of your information

You may request to access, and request corrections to, any of your personal information we hold.

We will endeavour to give you full access or make the requested corrections to your personal information. However, there may be some legal or administrative reasons to deny these requests. If your request is denied, we will provide you with reasons why, if possible.

Where we decide not to make a requested correction to your personal information, you may ask us to attach a statement of your requested correction to the information.

In accordance with the New Zealand Privacy Act 2020, we have the right to and may charge a reasonable fee for processing or responding to any request to access or correct personal information.

Where you give us information about others

If you give us personal information about someone else, you must ensure that you have their consent to do so (including their consent to us contacting them), so that, without us taking any further steps required by applicable privacy laws, we may collect, use and disclose such information for the purposes we have described in this Privacy Policy

This means you must take reasonable steps when providing personal information so that the individual concerned is aware of and/or consents to this Privacy Policy, including 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 and correct that information; and
- our identity, and how to contact us.

Our website and client portal

By using our website, you consent to our collecting, storing, using and disclosing your personal information in the manner described in this Privacy Policy.

When you visit our website, you will browse anonymously unless you have logged into a client portal or accessed the website from a personalised communication from us (in which case we may be able to identify you).

For all visitors to our website, we use cookies to collect anonymous information, such as the server your computer is logged on to, your web browser and your IP address. We may also derive a visitor's location from an IP address.

If you would prefer not to be identified, you can delete the cookies and reconfigure the cookie preferences on your web browser.

Cookies

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. While cookies are not considered personal information, they are generally used on sites to:

- access online services (authorising access and saving preferences);
- manage advertising (by collecting anonymous information about the webpages you visit and the software you use);
- monitor web traffic (such as time of visit, pages visited and user computer system information); and
- monitor use of a website.

If you log into a client portal, access our website from a personalised communication or provide us with personal information by completing a form online, we may use cookies to collect personal information about you.

You can configure your web browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each web browser is different, so check the Help menu of your web browser to learn how to change your cookie preferences.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites, then you may not be able to gain access to all of the content and facilities on those websites.

Changes to our Privacy Policy

We reserve the right to alter this Privacy Policy at any time. We will publish the updated Privacy Policy on our website and your continued use of our services and/or website or any continued interaction with us constitutes your agreement.

Contact us

If you have any questions or complaints regarding privacy or information handling, please contact us at:

The Privacy Officer

Hobson Wealth Partners Limited, PO Box 4349, Shortland Street Auckland 1140, New Zealand

Email: compliance@hobsonwealth.co.nz

We will respond to let you know who will be handling your matter and when you can expect a further response.

If your concerns are not resolved to your satisfaction, you may be able to escalate your complaint to an external dispute resolution scheme or to a regulatory authority. We can provide details of the appropriate scheme/regulator for you.



For more information

hobsonwealth.co.nz

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