

Privacy Policy

Last Updated: 12 November 2018

1. Your personal information

We take our responsibility for your personal information seriously. In our privacy policy we (First NZ Capital Securities Limited) set out how we will handle personal information we collect about you through the Direct Broking website (Website), Direct Broking account opening application (App), and in our other interactions with you.

In our privacy policy, “personal information” has the same meaning as in the Privacy Act 1993; that is information about an identifiable individual.

If you are a user who enters or uploads information about others to the App or the Website, including any person who is (or is intended to be) a joint account holder, you warrant that you have been duly authorized to enter or upload that information on behalf of each such person and must comply with your privacy law obligations to them. If you have a query concerning information about you that another user has entered or uploaded to Direct Broking, you can contact the user or us.

We may change this privacy policy from time and time. When we do so we will publish an updated version on our Website.

2. What we collect

We collect personal information from you:

- when you register as a user of the Website;
- when you are using the App or the Website and enter or upload information;
- when you contact or interact with us in relation to the App, Website, or services offered through the Website; and
- as you use the Website, in the form of statistics about how you use the Website.

3. Why we collect it, and what we use it for

We collect and use your personal information for various purposes such as:

- to set up your profile to use the Website and our services, including verifying your identity and the identity of any other authorised person (as defined in our Client Agreement);

- to provide our services including third party integrated services, carrying out your instructions, and administering your account;
- to develop our understanding of our users' preferences and interests in the Website and the services offered through the Website;
- to assist us resolve technical support issues or other issues relating to Direct Broking as they arise;
- for our internal research, development and the optimisation of our services;
- to let you know about surveys, promotions and any marketing activities we may undertake from time to time, or other opportunities or matters relevant to your account, or ancillary services provided by us (you may opt out at any time);
- to let you know about changes and updates to the Website, services, our terms of use and this privacy policy;
- to comply with laws and court orders both in New Zealand and overseas, including laws relating to anti-money laundering and countering financing of terrorism legislation, and to prevent fraud or other crimes;
- for the purposes and uses described in our Terms and Conditions; and
- to manage our relationship and/or services provided to you with you and exercise our rights under our terms of use for the Website and our Terms and Conditions.

If you don't provide the information we ask for, this may mean you are unable to use open an account with us or use the services provided through the Website.

4. Sharing your personal information

We may provide your personal information to our employees, related companies, contractors, advisors, agents regulators, exchanges, courts and other third-parties (including financial institutions), where permitted by or we believe this is appropriate to help us with any of the purposes we have outlined above. We will take reasonable steps to ensure that those recipients do not use that personal information for any other purpose.

We may release personal information when we believe this is appropriate for legal compliance and law enforcement, or will help prevent fraud, money laundering or other crimes (including to government agencies with statutory law enforcement responsibilities). To avoid doubt, we may disclose certain personal information where required under the NZX Rules, Clearing and Settlement Rules or Depository Rules.

We may also release personal information to enforce or apply our terms of use, our Terms and Conditions, or protect our company, our users, or others.

We can release personal information to third parties as instructed by you and in other ways permitted by the Privacy Act.

5. Right to access your personal information

To find out what personal information we hold about you, to get a copy of that information, and/or request corrections to that information as outlined in the Privacy Act, or for any further information about this privacy policy, please contact us at compliance@directbroking.co.nz.

6. Where we receive information about others from you

If you provide us with personal information about someone else, you must ensure that you have their consent to do so (including their consent to FNZC contacting them), so that, without us taking any further steps required by applicable data protection or privacy laws, we may collect, use and disclose such information for the purposes we have described in this 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 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 that information; and
- our identity, and how to contact us.

7. Cookies

We may use cookies when you are on the Website. Cookies are small blocks of text stored on your device. They allow us to recognise you (or rather, your internet browser) as you move around our site, and if you return to our site later. Cookies cannot read your hard drive or command your computer to perform any action.

Cookies may be used for security to help us identify you, to provide you with personalised features and for tracking traffic on our site. Any information we collect and share with third parties through cookies is aggregated and therefore anonymous (when shared with third parties, it does not include personal information which is likely to identify you).

You can prevent new cookies from being installed and delete existing cookies. The procedure depends on which browser you are using. For information on how to remove cookies check your internet browser. You may be unable to use Direct Broking unless you accept cookies.

8. Analytics

To improve our Website and services we may use patterns and other meaningful information gathered from website analytics tools. This may include the timing and frequency of your use of the Website, your IP address, page requests, form requests, mouse click activity and other information that you voluntarily enter into the website.

In addition, we may use third party cookies from third party services such as Google Analytics and/or Microsoft Application Insights. These services give us insight into behavioural information relating to users interests in our services, on an anonymous and aggregate level. This helps us to understand browsing behaviour to give a better experience whilst using our services.

You can access Google's Privacy Policy [here](#) and Microsoft's Privacy Policy [here](#).