

CLIENT INFORMATION PRIVACY POLICY

Introduction and Purpose

This Privacy Policy sets out how and when CooperAitken Limited collect personal information from you, how we use it, handle it and your right to see or change it.

This Privacy Policy sets out how we manage personal information and applies to all personal information collected by us, or submitted to us, whether offline or online, including personal information collected or submitted through our website, other mobile interactive features, through our official social media pages that we control, as well as through email messages that we send to you.

CooperAitken Limited comply with the New Zealand Privacy Act 2020 (“the Act”) when dealing with your personal information. This Policy does not limit or exclude any of your rights under the Act.

Interpretation

When we refer to “CooperAitken”, “we” or “us” we mean the NZ Limited Company registered as CooperAitken Limited (NZBN 9429037340735) which also includes all associated Contractors who are contracted to provide services and support on behalf of CooperAitken Limited.

When we refer to “personal information” we mean identifiable information about you, for example your name, email, address, telephone number etc.

This Privacy Policy applies from [DATE]. This Policy may change from time to time so please reread this Policy periodically. Any amendments or updates to this Policy will be published on our website.

Collection of Personal Information

We collect personal information about you from:

- i. you, when you provide it to us;
- ii. through our Website, Emails and Social Media Pages; and
- iii. third Parties, when you have authorised us/them to do so, or when the information is publicly available.

The types of personal information we collect, hold, and use

- a. Information we use to help confirm your identity. This can include names, addresses, telephone numbers, government-issued identifiers such as a drivers licence or passport, and other identifying information.
- b. Information collected in the course of providing our services. This can include financial or credit information.
- c. Information collected when you attend seminars or other events we run or are involved in.
- d. Information collected when you use our websites, apps, and social media profiles. This can include IP addresses, location data, and social media handles.
- e. Personal information collected from job applications and/or information collected from employees. This may include professional details and sensitive information such as personal health related information.

Purpose and Use of Personal Information

We will use your personal information:

- i. to verify your identity for legal compliance purposes, including compliance with the requirements of the Anti-Money Laundering and Counter Financing of Terrorism Act 2009;
- ii. to provide services and products to you, including:
 - preparation of annual accounts and returns
 - cash flow projections and budgets
 - taxation advice and planning
 - financial planning
 - payroll services
 - trust administration and trusteeships
 - business advisory services
 - business governance/advisory support
 - Agri-compliance
 - Business software support
- iii. to market our services and products to you, including contacting you electronically (e.g. by text or email for this purpose);
- iv. to improve the services that we provide to you;
- v. to undertake pre-employment checks and maintain applicable employment related information;
- vi. to bill you and to collect money that you owe us, including authorising and processing credit card transactions;
- vii. to respond to communications and requests from you;
- viii. to conduct research and statistical analysis (on an anonymised basis);
- ix. to communicate with you and notify you about changes to our Services;
- x. to protect and/or enforce our legal rights and interests, including defending any claim;
- xi. to engage with third parties on your behalf;
- xii. for any other purpose authorised by you or the Act or by other legislation.

If you do not wish to provide us with your personal information, we may not be able to provide you with the services you require.

CLIENT INFORMATION PRIVACY POLICY

Disclosing your Personal Information

We will not disclose your personal information unless disclosure is permitted by this Policy, or disclosure is legally required.

We may disclose your personal information to:

- i. another entity within our group;
- ii. any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products;
- iii. a credit reference agency for the purpose of credit checking you;
- iv. Police, EDUCANZ or other party in the nature of pre-employment checks;
- v. other third parties (for anonymised statistical information);
- vi. a person who can require us to supply your personal information (e.g. a regulatory authority);
- vii. any other person authorised by the Act or another law (e.g. a law enforcement agency);
- viii. any other person authorised by you;
- ix. a business that supports our services and products may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand, for example, cloud storage.

We use, and have access to, selected third-party services that facilitate and complement our services. By accepting our Terms of Engagement, you authorise us to disclose your personal information to the provider of those services to enable the facilitation and provision of those services to you. Any personal information disclosed to these third parties will be subject to the third party's own privacy policy and practices.

On occasion, we may use your personal information, such as your address or contact details, to provide you with industry information or to introduce you to additional services that we offer. We may, for example, send you written or electronic communications, electronic newsletters and/or invitations to events. If you do not wish to receive this type of information, you can opt out by contacting us at marketing@cooperaiklen.co.nz

We will not sell your personal information to any third-party organisation for marketing or advertising purposes.

International Rights and Cross Border Disclosures

If you live outside of New Zealand, this Privacy Policy and New Zealand privacy laws still apply to your personal information. Other international Privacy laws may also apply, setting out additional rights such as the right to erasure, restriction of use, or correction.

If you think international laws may apply, please contact us at the addresses provided in this Policy.

Where information is shared with a business or organisation outside of New Zealand, we will take every step reasonably necessary to ensure your information is treated securely and in accordance with this Policy.

Storage and Protection of Personal Information

Your personal information and privacy is important to us. We take all reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

We store personal information electronically and physically. All staff are trained on privacy and security, with regular updates provided as applicable.

CLIENT INFORMATION PRIVACY POLICY

We retain your personal information for only as long as is necessary for the purpose for which that personal information was collected and to the extent permitted by applicable laws. When we no longer need to use personal information, we will remove it from our systems and records and/or take steps to anonymise it so you can no longer be identified from it.

If we believe a privacy breach has occurred, we will take every practicable step to minimise any loss or harm. We will contact you to advise of the breach, and if it is likely to cause serious harm, will contact the Office of the Privacy Commissioner.

If you believe a breach has occurred, please contact us at the addresses provided in this Policy.

Viewing or changing your Personal Information

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we may require proof of your identity before being able to provide you with any personal information.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email us at mail@cooperaitken.co.nz. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting). We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

Any Privacy related Questions/Queries can be directed to:

By Post:
CooperAitken Limited
PO Box 23
Morrinsville 3300

Or by Email: mail@cooperaitken.co.nz

Policy Details

Policy Approved by:	Management Team
Policy in effect from:	September 2024
Policy to be reviewed (date):	September 2025
Responsible for policy review and update:	Management Team