



## PRIVACY POLICY

We understand that your privacy is important to you. It's important to us too. We want to be open with you about the personal information that we need to collect, hold, use and share to provide our services to you. The information in this privacy policy explains how we do this.

### 1. How does this privacy policy apply to you?

This privacy policy applies from 13 August 2024.

It covers all our interactions with you and, if we provide any services to you, forms part of our Terms of Engagement which you can find at [www.pic.co.nz/terms-of-engagement](http://www.pic.co.nz/terms-of-engagement).

Where this privacy note refers to we, us or our, it means P.I.C Insurance Brokers Limited and its related companies, including Stockade Premium Funding Limited (**Stockade**). Our address is 3/15 Accent Drive, East Tamaki, Auckland 2013.

We use examples throughout this privacy policy. They describe common scenarios with the aim of helping you understand the point they relate to. They don't cover all scenarios.

If we need to make changes to this privacy policy to protect the security of your personal information, or to comply with a change in the law, we may need to make the change immediately. In these cases, we may tell you after we've made the change. Otherwise, we will tell you about the changes at least 14 days before they come into effect.

Depending on how significant the changes are, we will tell you about the changes by:

- putting a notice on our website; or
- sending you a letter or email.

Our website will always have the current version of this privacy policy.

### 2. What personal information do we collect?

Personal information includes any information that could identify you. We collect the following types of personal information about you for ourselves and also as an agent for Stockade:

- basic personal, contact and demographic information
- sensitive and lifestyle information
- credit and background checks

- information about your beneficiaries, relationships, family members and dependents
- information about your current and previous employment, certifications and training
- information about your accounts, finances, property, assets, purchases and consumption
- unique identifiers and copies of official documents
- information about your current and previous insurances;
- claim information
- criminal records and professional disciplinary information
- events, meetings and calls information and CCTV footage
- marketing information and preferences
- sites and communication usage
- any other information required to arrange or advise on insurance products, to design, deliver and operate our services, or to run our business

In addition to collecting personal information about you directly from you, we also collect it from the third parties in section 4 and from other publicly available sources. We will treat this personal information in accordance with this privacy policy.

Before you give us information about anyone else, please get their consent.

Where necessary, we may also collect from you this personal information for your children and/or dependents.

You can choose to not share some of your personal information with us. However, it may mean that we can't confirm your identity, help you with your queries, provide our services, offer you insurance products or manage your insurance products. If an insurance product requires it, you have a duty under the law to disclose all relevant information.

We may include links to various third parties on our websites, applications, portals, social media channels and any other communications. We are not responsible for their content or what they do with any information they collect.

### 3. How do we use your personal information?

We use your personal information to:

- **Provide our services and/or arrange a loan to fund your premiums** e.g.:
  - determine if you meet the requirements for particular insurance products and advise you on insurance products that are suitable for you
  - get quotes for insurance products, arrange placement of insurance products and ongoing management of insurance products, including renewals, adjustments, cancellations, claims and settlement
  - confirm your identity, communicate with you about your insurance products and respond to your requests, queries and complaints
  - do any of the following which may be required in order to do the above: run credit or background checks, confirm your identity, make or manage transactions, send you information in relation to your insurance products or collect money that you owe us
- **Arrange a loan to fund your premiums** e.g. as an agent for Stockade:
  - determine if you meet the requirements for a loan to fund your premiums, arrange your loan and register a security interest
  - manage your loans, including payments, renewals, adjustments and cancellations
  - confirm your identity, communicate with you about your loans and respond to your requests, queries and complaints
  - do any of the following which may be required in order to do the above: run credit or background checks, confirm your identity, make or manage transactions, send you information in relation to your loans, collect money that you owe to Stockade or enforce Stockade's security interests
- **Improve our services** e.g.:
  - conduct research and development to improve our services and enhance client experience and our relationship with you
  - suggest better ways to use our services and personalise your experience
  - suggest insurance products and provide other information that may be of interest

- decide where and how to market our services
- **Run our business effectively** e.g.:
  - keep accurate records and create business plans and management reports
  - build, improve and maintain systems and processes, train our staff and manage our risks
  - conduct market and services analysis (including analysing patterns of use, data analytics and risk modelling)
  - design, deliver, improve and administer our websites, applications, portals and social media channels
  - enable commercial transactions, such as selling, purchasing, merging or reorganising our business or assets (including client portfolios)
- **Prevent crimes and comply with laws** e.g.:
  - identify and investigate illegal activities like fraud and money laundering
  - report required information to our regulators
  - comply with our obligations under New Zealand and international laws, including under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, the Companies Act 1993, the Credit Contracts and Consumer Finance Act 2003, the Financial Markets Conduct Act 2013, the Insurance Intermediaries Act 1994, the Privacy Act 2020, the Tax Administration Act 1994 (as amended or replaced)
  - ensure the security and safety of our properties, staff and others
  - exercise and defend ours, yours or others' legal rights

You can choose to not receive marketing communications from us by clicking the 'unsubscribe' links in any marketing email or text message, or by contacting us using the details in section 7. If you opt out of receiving marketing material, we will still need to send you operational communications.

We will keep your personal information for as long as it is required to achieve the purposes set out in this privacy policy.

### 4. Who do we share your personal information with?

We share your personal information with:

- **Third parties who help us provide our services** e.g.:
  - insurers and other brokers
  - others who are named on your policy as co-insureds, or who have authority to act on your behalf, including powers of attorney, solicitors and executors
  - people and organisations who can confirm information you've given us, help us with identity verification, run credit and background checks, give us information about your health and give us any other information we need to provide our services
  - people and organisations who you ask us to make payments to and for other transactions
  - postal organisations and other organisations who help us interact with you by post and online
  - assessors, engineers, valuers, investigators and other service providers who are assessing or investigating your claim
  - repairers, suppliers and other service providers who are repairing or replacing your insured items
  - mortgagees and others with a recorded financial interest on a policy
  - organisations who help us recover money owed to us
- **Third parties who help us arrange a loan to fund your premiums** e.g. as an agent for Stockade, we share your personal information with:
  - insurers and other brokers who arrange a loan for you with Stockade
  - organisations who provide credit, systems or documents to Stockade for the purposes of providing premium funding
  - others who are borrowers or guarantors under your loan, or who have authority to act on your behalf, including powers of attorney, solicitors and executors
  - people and organisations who can confirm information you've given us, help us with identity verification, run credit and background checks, register security interests and give us any other information we need to provide a loan
- people and organisations who you ask us to make payments to and for other transactions
- postal organisations and other organisations who help us interact with you by post and online
- organisations who help us recover money owed to Stockade or enforce Stockade's security interests
- **Third parties who help us improve our services** e.g.:
  - marketing specialists (including market researchers, marketing agencies, social media specialists and customer experience specialists)
  - organisations that offer our services to their customers
  - organisations that offer products and services to you where we think that might be of interest to you
- **Third parties who help us run our business effectively** e.g.:
  - lawyers, accountants, auditors, consultants, banks, financial institutions, financial advisers and other service providers
  - IT software, security, data storage and cloud suppliers
  - people and organisations who help us build, improve, run and maintain systems and processes, train our staff and manage our risks
  - third party cookie providers, such as Google Analytics, which give us insights into demographics and behavioural information, who has viewed our advertising on other websites, and help us understand browsing behaviour
  - marketing, digital, communications and sponsorship specialists (including market researchers, marketing agencies, social media specialists, customer survey providers and customer experience specialists)
  - sponsorship and charitable partners
  - industry bodies
  - referral agents
  - people and organisations who we conduct commercial transactions with, such as selling, purchasing, merging or reorganising our business or assets (including client portfolios)

- **Government and regulatory bodies, and courts, to prevent crimes and comply with New Zealand and international laws** e.g. the Financial Markets Authority, the Commerce Commission, the Department of Internal Affairs, the Police and judicial bodies
- **Dispute resolution services** e.g. the Insurance & Financial Services Ombudsman (IFSO) where you ask them to resolve a complaint
- **Our related companies**
- **Other third parties when you ask us to or agree to us doing so**

From time to time, we share your information with a third party who is overseas. They may need to comply with laws that require them to share this information with other parties.

## 5. How do we keep your personal information safe?

We strive to ensure the security, integrity and privacy of all the personal information you provide to us.

Generally, we hold your personal information in New Zealand. It may be held on our behalf by data storage providers, including cloud-based storage providers, who hold data in New Zealand or overseas.

These are some of the ways we protect your personal information:

- **IT system security measures** e.g. we limit digital access to your personal information to those who need it for the purposes set out in section 3 and we utilise firewalls and virus scanning software to block unauthorised access to our servers
- **Physical controls** e.g. we limit access to our physical buildings through the use of alarms, cameras and/or access cards, and the physical servers we utilise are in secure locations which are accessible only by those who are authorised
- **Third party assurances** e.g. we take reasonable steps to ensure the third parties in section 4 (with whom we share personal information or who hold personal information on our behalf) have reasonable security measures in place to protect personal information
- **Internal procedures** e.g. we have internal procedures that govern how we store, secure, access, use and share your personal information, we test these procedures through, amongst other things, penetration and business continuity testing, and we

regularly identify and review cyber and other security risks and implement measures to manage those risks

While we do what is reasonable to keep your personal information safe, to the extent the law permits, we disclaim all liability for events arising from unauthorised or improper access, use or sharing of your personal information.

## 6. How to access, update and correct your personal information

It is important that the information you give us is complete, accurate and up to date.

You have the right to request access to, update or correct your personal information. If you'd like to do so, please contact us using the details in section 7. We'll usually get back to you within 20 working days. If it's going to take longer, we'll make sure we keep you updated.

In some cases, we may have grounds under the Privacy Act 2020 for refusing your request. If we do this, we'll explain the reasons for our decision. If we refuse a request to correct certain information, you can ask us to attach a statement of correction to your personal information.

We don't usually charge a fee to complete these sorts of requests. If we are going to, we'll let you know so you can decide if you want to proceed before we go ahead.

## 7. How to get in touch with us

If you have any questions or concerns about this privacy policy or our handling of your personal information, please submit an enquiry through [www.pic.co.nz/contact](http://www.pic.co.nz/contact), contact us at [admin@pic.co.nz](mailto:admin@pic.co.nz), call us on 0508 742 742 or write to us via PO Box 58842 Botany Auckland 2163.

If you would like to make a complaint, please follow our complaints process which can be found at [www.pic.co.nz/complaints](http://www.pic.co.nz/complaints). Additionally, if you're not satisfied with how we've handled your complaint after you've been through our internal process, you can contact the Office of the New Zealand Privacy Commissioner. More information can be found at [www.privacy.org.nz](http://www.privacy.org.nz).