

New Zealand Privacy and Credit Reporting Policy

1. Introduction

Maia Financial New Zealand Limited (NZBN 942 903 879 8337) and its related bodies corporate (**Maia Financial, we, our, us**) respects the importance of protecting your privacy. We comply with our obligations under the *Privacy Act 2020* (NZ) (**Privacy Act**), including the Information Privacy Principles (**IPPs**), as well as our obligations in relation to credit-related information in connection with the *Credit Reporting Privacy Code 2020* (**CR Code**).

This Policy describes how Maia Financial collects, uses, discloses, stores and retains your personal information if:

- you are an individual (e.g. as a sole trader or as a member of a partnership) applying for a lease or other credit product, or who holds a lease or other credit product, from us; or
- we deal with you in connection with an application for credit made by, or provided to, another customer (e.g. as a guarantor or proposed guarantor for such credit or as a director or a shareholder of a company obtaining such credit).

By providing us with your personal information, you consent to us using and disclosing it for the purposes set out in this Policy. We will update this Policy when our information handling practices change, or when required. Any revised Policy will take effect when it is published on our website.

2. Our Functions and Activities

We collect, use, disclose, store and retain your personal information so that we can carry out our business functions and activities and provide the best possible customer service, including as an agent for a third-party funder or to securitise the transaction. Our collection, use and disclosure of your personal information will depend on our relationship with you, the types of products or services you request from us and our legal obligations..

We may collect, hold, use and disclose your personal information for the following purposes:

- to assess your application for a commercial credit account with us and whether to provide you, or an entity associated with you, with credit, including verifying your identity and evaluating your credit worthiness.
- if you are a guarantor or a proposed guarantor for a commercial credit account, to assess your suitability as a guarantor, keep you informed about the guarantee and enforce the guarantee if necessary.
- to provide products and services to you, including providing you with credit to hire, lease, rent or purchase goods or services.
- to administer and manage the products and services provided to you or other relationships and arrangements in relation to those products and services or our business, including managing credit and assisting you to meet your credit-related obligations.
- to undertake securitisation activities and other activities relating to our funding needs and provision of products and services.
- to administer your insurance policy, assess any insurance risks or claims associated with you or our products and services.
- to participate in the credit reporting system and provide information to credit reporting bodies as permitted by the New Zealand Privacy Act and the CR Code.
- to detect and prevent instances of fraud, unlawful conduct, and other risks to you or our products and services.
- ongoing monitoring of credit worthiness and dealing with serious credit infringements.

- to enforce our rights, including collection of outstanding payments, debt recovery and other enforcements and where necessary, initiating legal proceedings.
- to process payments and invoices as well as attending to our internal accounting and administration requirements.
- to provide customer support, including conducting and responding to enquiries, feedback, comments and complaints about our products and services.
- to inform and conduct marketing activities including data analytics and promoting products and services from us and our related entities.
- to undertake review and maintenance of our systems and infrastructure and conduct research about our products and services to improve our products and services, marketing activities and customer experience.
- to perform data analyses and generate customer insights and statistical data which may include combining personal information from reputable data sources and public sources of information.
- to manage and carry out our business and operational functions, including HR management, business decisions and assessing your suitability for appointment as a contractor or supplier; and
- to maintain records and comply with our domestic and foreign legal and regulatory reporting and compliance obligations. Some of the key New Zealand legislation which may apply include:
 - *Consumer Guarantees Act 1993*
 - *Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and any other anti-money laundering legislation*
 - *Personal Property Securities Act 1999; and*
 - *Tax Administration Act 1994, the Income Tax Act 2007 and any other taxation laws and regulation.*

3. Information we collect

Personal information is any information about you, from which you can be identified. The types of personal information that we may collect include identify and contact information such as your name, residential and business address, driver licence number (which is voluntary for you to provide to us) and passport number for identification purposes, email address, date of birth, gender and telephone number, and financial and related information such as payment and credit card details, employment, current and two previous residential addresses, marital status, number of dependents, assets and liabilities. We may collect additional personal information from you from time to time.

Personal information also includes credit-related information, such as credit information, which is information that relates primarily to your credit-related dealings with us which we can disclose to credit reporting bodies, and credit eligibility information, which is information provided to us by credit reporting bodies, including information about your credit-related dealings with other credit providers, any credit worthiness information that we derive from the data from a credit reporting body, for example credit ratings, scores and evaluations about you and your credit worthiness. The types of credit-related information that we collect about you may include your account details, credit application history, credit payment and default history, court proceedings, insolvency actions and creditworthiness.

We generally do not collect personal information about you, unless you provide it to us voluntarily. For example, when you apply for a form of hardship relief, you may provide personal information such as health information. You may provide personal information when you otherwise interact with us, such as racial or ethnic origin, sexual orientation, religious or philosophical beliefs or political opinion and

membership or affiliation information. You consent to us collecting personal information which you provide to us voluntarily.

If you are an employee or prospective employee, we may need to collect personal information about you and you consent to us collecting this information. For example, personnel records may include or personal information such as place of birth, racial or ethnic origin, criminal record, tax file number, disabilities and relationship information. Recruitment records may include employment history and experience, referees and other employment related information.

If you provide us personal information, we will handle it in accordance with this Policy.

You don't have to give us all the information we request. However, if you do not provide us with some or all of the personal information required, we may be unable to consider or approve your application, complete the transaction you have entered into, accept you as a guarantor, or provide a product or service to you or information you request, to the requested standard or at all, and you may also miss out on receiving valuable information about us and our products and services.

4. How we collect information

Where we can, we will collect information directly from you, unless you authorise us to obtain your personal information from a third-party. We collect personal and credit-related information when you:

- complete any application for commercial credit or a Maia Financial agreement.
- request us to provide our products and services or make an enquiry about our products and services.
- subscribe to communications from us such as updates, publications or newsletters.
- have entered into a business relationship with us and we are managing the products and services we provide to you.
- contact us to provide feedback, comments or suggestions on our functions and activities.
- interact or engage with us through our websites or social media platforms.
- apply for a job with us or become an employee, or become a supplier or contractor that provide a product or service to Maia Financial; or
- otherwise interact with us or disclose your personal information to us.

As well as collecting information directly from you, there may be occasions when we collect information about you from other people or organisations, including from our related bodies corporate. Where we receive information about you indirectly from third parties, we require that the third-party has collected and disclosed that information in accordance with the Privacy Act or the CR Code where applicable.

Third parties we collect information about you from may include:

- agents of Maia Financial that provide our products and services on our behalf.
- credit reporting bodies, other credit providers and businesses which provide information about commercial credit worthiness to assess your credit worthiness.
- law enforcement agencies and government agencies to verify your identity.
- your representatives (lawyers, executors, administrators, real estate agents, guarantors, brokers, insurers, accountants and financial advisors).
- your nominated referee or employer when you apply for a product or service.
- your nominated bank when you apply for a product or service.
- supplier, service providers and contractors that provide services to us such as customer due diligence and identification, and debt collection agencies.

- third parties that provide marketing leads, marketing and data analysis services to us; and
- reputable data sources and publicly available sources of information.
- if you are a prospective employee, your nominated referee, law enforcement agencies for police checks or intermediaries such as recruitment agents and personnel providers; and
- any other third-party where you have authorised the disclosure of your personal information by that third-party to us.

5. Cookies and how we use them

We (and authorised third parties) may use cookies and tools, such as web beacons and web server logs, to collect, store and monitor visitor traffic information and actions on our website. Cookies are small data files which are placed on your computer that allows our websites to “remember you” when you return to our websites. These cookies and tools are not used to record any personal information. Third-party services may have their own privacy policies.

The information collected by these tools may include geolocation data, the IP address of the device you are using and information about websites that IP address has come from, the pages accessed on our website. We may use and combine this information to maintain, secure and improve our websites, enhance your experience when using our websites, display and deliver relevant content, services and advertising and understand the effectiveness of our marketing and advertising (including direct marketing and online ads on third-party websites).

If you want to prevent cookies being used, you can change your browser settings to disable cookies. However, you may not be able to access all or parts of our websites, or you may experience reduced functionality when accessing certain services.

6. Disclosure of personal and credit-related information

For the purposes listed above, and where the Privacy Act or the CR Code permits, we may disclose your personal and credit-related information to our officers, employees, contractors, our related bodies corporate and other third parties in connection with our functions and activities, including:

- to the supplier or retailer of any goods or services financed with credit we provide.
- where we act as an agent for, or otherwise on behalf of, another person, such as third-party funders, to the principal or that other person.
- to entities who may wish to purchase the goods or services financed with credit we provide, usually at the end of the credit term.
- to other financial institutions, security registration bodies, insurers, valuers, brokers, credit reporting bodies and credit providers for funding or securitising transactions and for assessing your credit worthiness.
- to organisations involved in debt assignment or securitisation arrangements.
- to your authorised representatives (lawyers, executors, administrators, accountants and financial advisors) and guarantor or intending guarantor.
- to regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.
- to debt collectors and utility companies.
- to external dispute resolution schemes.
- when we may be required to comply with any law from time to time; or
- to any other third-party where we have obtained your authorisation to disclose of your personal information to that third-party.
- To conduct market research, or make available information about our products, or to provide information about events.

We may also disclose personal and credit-related information to our suppliers and service providers that provide products and services to us in connection with our functions and activities, including third parties who:

- deliver marketing and digital marketing services.
- mailing, courier and print service providers.
- conduct data analysis and data matching services.
- conduct market research, surveys and analysis.
- host our servers and websites.
- provide IT services.
- provide call centre services.
- data processing, storage and back-up
- process payments.
- are our lawyers, financial advisors and accountants.
- provide recruitment consultant services; or
- manage HR information such as payroll and superannuation.

Some of the third-party service providers we disclose your information (including any credit related information) to for them to process and/or store your personal information on our behalf may have servers located overseas in various countries, including US, Canada, Singapore and Japan.

We require that all third parties, to whom we disclose personal and credit-related information to, have appropriate controls to protect your information in a manner that is consistent with our Policy, including in relation to security and confidentiality. They must only use your personal and credit-related information for authorised purposes.

7. Direct Marketing

Maia Financial may, from time to time, send direct marketing communications to you about us and our products and services and other material that we consider you would find interesting or useful. If you do not wish to receive such direct marketing communications, you can opt out in three ways:

- Clicking on the unsubscribe link on the bottom of the direct marketing communication.
- Sending (or replying) to an email, requesting to opt-out.
- Calling us on 0800 472 633

We will enact your request within five business days.

If you choose to opt out of all direct marketing communications, please note that Maia Financial may still contact you for other reasonable purposes, including information that Maia Financial is legally required to send, notifications of changes to Maia Financial products and services or policies and information regarding the use, rights, benefits or obligations of customers of our products and services.

8. How we hold information and keep it secure

Maia Financial holds your personal and credit-related information both electronically, on our own servers and those of our service providers, and in hard copy at our secured offices or secure offsite storage facilities.

Maia Financial takes the security of your personal and credit-related information seriously and we implement a range of technical, administrative, personnel and physical measures to safeguard your personal and credit-related information against loss, interference and unauthorised access, modification and disclosure, and misuse, including using electronic (such as firewalls, password

protection, encryption and secured systems) and physical (such as locked cabinets, offices and secured premises) access restrictions to files containing personal and credit-related information and ensuring encryption of information sent and received.

We include terms in our agreements that require that all third parties must protect your information in a manner that is consistent with the Privacy Act,. These third parties must only use your personal and credit-related information for authorised purposes.

Maia Financial retains your personal and credit-related information while it is required for any of our business functions, or for any other lawful purpose. We use secure methods to destroy or to permanently de-identify your personal and credit-related information when it is no longer needed or if we determine that the personal and credit-related information received is required to be destroyed or permanently de-identified.

9. Access and correction of information about you

It is important to us that the information we hold about you is up-to-date, accurate and complete, and we will try to confirm your details through our communications with you and promptly add updated or new personal and credit-related information to existing records when we are advised. If any of your details change, please notify us as soon as you can. If you believe we are holding information about you that is inaccurate, incomplete, irrelevant or misleading, you can ask us to correct it, or delete it altogether.

If you would like to access your personal or credit-related information, including credit information, or ask us to update or correct, you can do so by contacting us in writing and verifying your identity. We will do our best to respond to your request within 20 working days.

We will only refuse access in exceptional circumstances, and if this is the case, we will advise you of our reasons for doing so. We may charge a fee for searching for, and providing access to, your information on a per request basis.

10. Privacy Complaints

We take your complaints seriously and will attempt to resolve your issue quickly and fairly.

If you believe that Maia Financial has breached the Privacy Act in relation to the way in which we manage personal and credit-related information about you:

- you may make a complaint addressed to the Maia Financial Privacy Officer using the contact details below. The complaint must identify you and be in writing.
- you will receive an acknowledgement of receipt of your complaint from us as soon as reasonably practicable after we receive it and in any case within seven days of receipt. We will let you know if we need any further information from you to resolve your complaint.
- the Maia Financial Privacy Officer will investigate your complaint and will endeavour to provide a response setting out Maia Financial's decision in writing within 20 working days of receipt of your complaint. If we cannot resolve your complaint within this period, we will write to you notifying you as to the reasons why, specifying when we expect the matter to be resolved and seeking your agreement to extend the 20 working day period. If you do not agree, we may then not be able to resolve your complaint.
- where your complaint relates to your credit information, we may consult with a credit reporting body or other credit provider in order to investigate and resolve your complaint; and

- if Maia Financial is unable to satisfactorily resolve your concerns you can contact the Office of the New Zealand Privacy Commissioner on their website <https://www.privacy.org.nz/>.

11. Our contact details

If you require any further information or have any questions about this Policy or if you wish to access or correct your personal and credit-related information or make a complaint about our handling of that information, please contact the Maia Financial Privacy Officer as follows:

Email: privacyenquiries@maiafinancial.co.nz
Telephone: 0800 472 633
Post: Privacy Officer
Maia Financial New Zealand Limited
PO Box 1535
Shortland Street
Auckland 1140
New Zealand

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