



# Privacy Policy

Alpha First Securities Limited

AFS is committed to protecting your personal information. We have created this Privacy Policy to help you understand how and why we collect information from you, how we store it, how you can access and correct that information and when we might disclose information to other people.

This Privacy Policy does not limit or exclude your rights under the Privacy Act 1993.

This Privacy Policy was adopted by Alpha First Securities Limited on 15 July 2016





## Application of this Privacy Policy

This Privacy Policy applies to all instances where we collect information about you.

## Consent to the collection of your personal information

By accessing AFS's website (Website), contacting AFS and/or using the services offered by AFS (Services), you consent to the collection, use, disclosure, storage and processing of your personal information in accordance with this Privacy Policy.

## Collection of your personal information

We will collect personal information submitted by you through the Website, information on your browsing activity when using the Website, any communication with AFS directly via writing, phone or email and information obtained through your use of the Services. We may supplement the information you provide us with information we receive from third parties.

## Personal information we may collect

We may, in addition to other information, collect the following general information (General Information) about you:

- Your name, email address, residential address, telephone number, gender, date of birth and password.
- Preference information such as a favourite list, transaction history, investment preferences and marketing preferences.
- Information on your business such as your company name and number, company size, business type and professional profile.
- Information that you provide to us when we communicate via writing, email or phone.
- Details of your browser, domain name and IP address, and the details of any website you linked from to the Website.
- Information obtained from third parties in accordance with this Privacy Policy.
- Other additional information required from time to time.

In addition to the General Information outlined above, we may collect information such as your bank account number and other financial information (Financial Information) from you.

If you choose not to provide information when we ask for it, you may not be able to utilise the Website or the Services.



## Use of your personal information

The information that we collect from you (whether General Information or Financial Information) may be used for a number of purposes relating to our business, which include:

- To assess and ascertain your suitability to register an account with us and utilise the Services.
- Performing the Services and any assistance required in connection with the Services.
- To satisfy our obligations arising from any contracts entered into between you and us.
- In the case of entrepreneurs or businesses seeking capital, to verify and approve the disclosures you make to potential investors.
- Provide you with information about us, products and services and new investment opportunities that we think may be of interest to you.
- To allow third parties with whom we have a business relationship (Business Partners) to provide you with information about products, services and other opportunities that they think may be of interest to you.
- To contact you to ensure customer satisfaction in respect of our role as the Service provider.
- To monitor, improve and administer the Website.
- Responding and following up on any queries, complaints or requests you might have made, and other customer care issues.
- Enable us to conduct surveys and analyse information pertaining to users of the Services and Website.
- To enable us to comply with our legal and regulatory obligations or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.

You also consent to AFS collecting, using and disclosing your personal information for the following purposes:

- Verifying any information that you give to us (or information that we may collect from other sources) with third parties and third party databases, including Government agencies (including but not limited to NZ Transport Authority, Motor Vehicle Register, PPSR).
- Carrying out credit checks on you with a credit reporting agency for the requirements of the Anti-Money Laundering and Countering Financing Terrorism Act 2009. This will require us to give your information to the credit reporting agency as well as the credit reporting agency providing information about you to us.
- Verifying any information that you give to us (or information that we may collect from other sources) with third parties and third party databases for the purposes of fraud prevention or the Anti-Money Laundering and Countering Financing Terrorism Act 2009.
- Where you have voluntarily given us your driver licence information, this information may also be disclosed to a credit reporting agency and the Ministry of Justice as part of the checks we undertake with them.



You authorise any third party to provide your personal information to us for any of these purposes.

You understand that if we disclose your personal information to a credit reporting agency, they may hold your information on their credit reporting database and use it for providing credit reporting services and for any other lawful purpose and they may disclose your information to their subscribers for the purpose of credit checking or debt collection or for any other lawful purpose.

## Protecting your personal information

We will take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from unauthorised access, modification or disclosure.

## Retention of your personal information

We will hold your personal information both before and after the cancellation of your account, but only for so long as we are lawfully entitled to do so.

## Sharing your personal information

We will keep confidential all personal information collected about you. The only exceptions to this are:

- The disclosure relates to the purpose for which the information was collected.
- You have provided us with express consent to disclose your personal information.
- We may disclose certain personal information about you to businesses that you invest in through the Website or as part of our broking services.
- We may disclose certain personal information about you to third-party service-providers in the course of their provision of services us. We will take reasonable steps to ensure that these service-providers are obligated to keep confidential any of your personal information that they receive and use.
- We may disclose or trade your General Information to our Business Partners in order to allow those Business Partners to provide you with information about products, services and other opportunities that they think may be of interest to you. Your Financial Information will not be disclosed to Business Partners or third parties for this purpose.
- Any person or organisation authorised by the Privacy Act 1993.
- Persons or organisations to whom we may be required to pass your personal information for the purposes of complying with any legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.
- In the event that we intend to enter into a major corporate transaction such as a sale of assets or control or we list on a stock exchange, we may disclose your personal information to third parties. If we disclose your personal information, we will take reasonable steps to ensure it remains confidential.



## Use of Cookies

We may set and access Cookies on your computer. "Cookies" are text files placed on your computer for the purpose of collecting non-personal visitor behaviour information and information about your operating system, domain name and IP address. The information collected is anonymous and is used for the purpose of understanding how you use the Website to enable us to enhance your online experience.

You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. In addition, you may delete Cookies that have already been placed on your hard drive. For further details please consult the help menu in your browser. Disabling or deleting Cookies may prevent you from using the full range of services available on the Website.

The use of Cookies by our partners, affiliates, advertisers or service providers are not covered by our Privacy Policy nor are we responsible for their privacy practices and/or the reliability of the information published by them.

## Accessing your personal information

You may request access to all of the personal information that we hold about you by contacting us at:

Email: info@alphafirst.co.nz

Postal address: Attention: Privacy Officer  
Alpha First Securities Ltd  
127 Collingwood St  
PO Box 9127  
Hamilton 3204

Please quote your name along with a brief description of the information you would like a copy of.

## Correction of your personal information

If the information held by us is inaccurate, incomplete or not up to date, you may ask us to correct the information.

## Changes to the Privacy Policy

We may change this Privacy Policy from time to time by uploading a new version on the Website.

