Alpha First

Privacy Policy

April 2026

www.alphafirst.co.nz

Alpha First (**AF** and **we**) 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 2020.

This Privacy Policy was adopted by Alpha First on 30 April 2026.

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 AF's website (**Website**), contacting AF and/or using the services offered by AF (**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 or any client information forms that you may complete;
- information on your browsing activity when using the Website;
- any communication with AF 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, including but not limited to agents and service providers that we may engage to assist us with any of the purposes for which we may collect your personal information and third parties connected with the matters/purposes for which you have engaged us.

We may also collect personal information that is publicly available as part of carrying out customer due diligence or as part of the provision of Services.

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, citizenship 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, your shareholding, 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 that we are required to collect to comply with our legal obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009(**AMLCFT Act**) such as your source of wealth, and whether you are a high net worth individual.

• 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 are providing us with personal information about someone else, it may be necessary to make sure that other person is aware that you contacting us and/or using our Services may involve collecting, using, and disclosing their personal information. Please ensure you comply with your privacy obligations relating to the personal information of others that you provide to us. We can discuss this with you if the matter arises.

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

Indirect Collection of Personal Information from Third Parties

In some circumstances, we collect personal information about you from third parties rather than directly from you. This is known as indirect collection. We may do this where permitted under the Privacy Act 2020, including where an exception applies.

Examples include identity verification and customer due diligence undertaken to meet AML/CFT obligations; credit and fraud prevention checks; information obtained from business partners, intermediaries, referral partners, and third-party service providers acting on our behalf.

IPP3A Notification

Where we collect personal information indirectly, we will take reasonable steps to ensure you are informed of the fact of collection; the purpose of collection; intended recipients; our identity and contact details; any law authorising the collection; and your rights of access and correction. This information will be provided as soon as reasonably practicable unless a statutory exception applies.

Use of your personal information

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

- To verify your identity, perform customer due diligence and for other administrative purposes;
- 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 (including but not limited to our obligations under the AMLCFT Act), the requirements of any regulator or in connection with legal proceedings, crime or fraud prevention, detection or prosecution.

You also consent to AF 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 but not limited to Government agencies (by way of example only NZ Transport Authority, Motor Vehicle Register, PPSR) for the purposes of fraud prevention, requirements under the AMLCFT Act or other administrative purposes.

• Carrying out credit checks on you with a credit reporting agency for the requirements of the AMLCFT Act. 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.

• 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:

• identification verification and screening agencies (each an intermediary) they may temporarily hold such information for the purposes of process audit and errorchecking;

• any document issuer, official record holder, credit bureau and authorised third parties' data providers (data provider), they may retain a record of the fact that we, or an intermediary has requested a data comparison;

• 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 to us (as set out below).
- 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 2020.

• 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.

The third-party service providers that we may also disclose your personal information to for the purposes of the provision of their services to us, include:

• IT systems or services providers;

• data management, processing and storage service providers;

• auditors;

• banks and other financial service providers;

• third parties engaged in the course of providing our services (such as barristers, mediators, arbitrators, witnesses and subject -matter experts); and

• service providers that assist us with client insight analytics.

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

Attention : Privacy Officer

Postal Address: Alpha First

104/86 Alpha Street

Cambridge, 3434,

New Zealand

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. You may also provide us with a statement of the correction you are seeking, and if we do not agree to make the correction you have requested, you may request that we attach the statement of correction to the relevant information.

Changes to the Privacy Policy

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