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**THOMPSON BLACKIE BIDDLES  
PRIVACY POLICY**

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## CONTENTS

1. INTRODUCTION .....	1
2. CHANGES TO THE POLICY .....	1
3. INFORMATION WE WILL BE COLLECTING .....	1
4. WHO DO WE COLLECT YOUR PERSONAL DATA FROM.....	1
5. HOW WILL WE USE YOUR PERSONAL INFORMATION .....	1
6. DISCLOSURE OF PERSONAL INFORMATION .....	2
7. PROTECTING YOUR PERSONAL INFORMATION .....	2
8. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION .....	2
9. INTERNET USE.....	2

## **1. INTRODUCTION**

- 1.1 Thompson Blackie Biddles Limited (**we**) complies with the New Zealand Privacy Act 1993 (the **Act**) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).
- 1.2 This policy sets out how we will collect, use, disclose and protect your personal information and does not limit or exclude any of your rights under the Act. Visit [www.privacy.org.nz](http://www.privacy.org.nz) should you require further information on the Act.

## **2. CHANGES TO THE POLICY**

Changes may be made to this policy by uploading a revised policy onto our website and will apply from the date that the revised policy is uploaded.

## **3. INFORMATION WE WILL BE COLLECTING**

- 3.1 We are required by law to collect personal information from you to verify your name, date of birth and address to satisfy our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (the **AML/CFT Act**) and related legislation.
- 3.2 This information will be collected by asking for your Identification Document which sets out your name and date of birth and proof of your residential address.

## **4. WHO DO WE COLLECT YOUR PERSONAL DATA FROM**

Personal information about you will be collected from:

- 4.1 you, when you provide that personal information to us, including via our website or through any contact with us (e.g. telephone call, mail or email).
- 4.2 third parties where you have authorised this or from publicly available information.

## **5. HOW WILL WE USE YOUR PERSONAL INFORMATION**

We will use your personal information (as applicable):

- 5.1 to verify your name, date of birth and address to satisfy our obligations under the AML/CFT Act and related legislation, using from time to time third parties to provide such verification;
- 5.2 to act on your behalf in relation to matters necessary or incidental to your engagement of us;
- 5.3 for any purpose specified in our standard terms of engagement;
- 5.4 for any other purpose you may authorise.

## **6. DISCLOSURE OF PERSONAL INFORMATION**

We may need to disclose your personal information to:

- 6.1 a person who can require us to supply your personal information (e.g. a regulatory authority, government agencies or banks with which we place your funds to meet our obligations under the Act);
- 6.2 any other person authorised by the Act or another law (e.g. a law enforcement agency);
- 6.3 a credit reference agency for the purpose of conducting a credit check on you;
- 6.4 any third party provider which we use to verify your identity and information relating to your identity as part of us satisfying our obligations under the AML/CFT Act;
- 6.5 any other person authorised by you.

## **7. PROTECTING YOUR PERSONAL INFORMATION**

We will take reasonable steps to ensure your personal information is securely stored and safe from loss, unauthorised activity or misuse.

## **8. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

- 8.1 You have the right to request a copy of any personal information we hold about you, and to request a correction to your personal information. Before we consider a correction to the information, we will require evidence of confirmation that you are the individual to whom the information relates.
- 8.2 If we think the request for correction is reasonable and we are reasonably able to change the personal information, the correction will be made. Should the correction not be made, we will take reasonable steps to note on the personal information that you requested the correction.

## **9. INTERNET USE**

While reasonable steps are taken to maintain secure internet connections, should you provide us with personal information over the internet, provision of that information is at your own risk.