

## **JARDEN PRIVACY POLICY**

30 April 2024

### **1 Your personal information**

Jarden Wealth and Asset Management Limited NZBN 9429051443924 and its respective subsidiaries and affiliates in New Zealand (referred to as **Jarden, we, us and our**) take our responsibility for your personal information seriously and are committed to managing personal information per the New Zealand *Privacy Act 2020* (**Privacy Act**).

In our privacy policy, we outline how we handle and manage the personal information we collect and/or hold about you. The term "personal information" carries the same meaning as in the Privacy Act, specifically referring to information about an identifiable individual).

We may change this privacy policy from time to time, with or without notice to you. When we do so we will publish an updated version on our Jarden Website [www.jarden.co.nz](http://www.jarden.co.nz) (**Website**). We recommend that you visit our Website regularly to keep up to date with any changes.

This policy does not limit or exclude any of your rights under the Privacy Act. If you wish to seek further information on the Privacy Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

Other terms may also apply to you and the information we hold about you. For example, sometimes we may also provide a privacy collection statement at the time we collect personal information from you. A privacy collection statement may include additional terms.

### **2 What personal information we collect**

#### ***Clients and prospective clients***

When you enquire about our services or when you become a client of Jarden, a record is made that includes your personal information.

The types of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:

- Personal details such as your name, e-mail, postal address and other contact details.
- To the extent applicable:
  - information about your employer or an organisation that you represent.
  - your professional details.
- Any additional personal information you provide to us, or authorise us to collect, as part of your interaction with us.

#### ***Prospective employees/applicants***

We collect personal information when recruiting personnel, such as your name, title, date of birth, gender, contact details, qualifications, and work history (including references and other information included in a CV or cover letter as part of the application process). Generally, we will collect this information directly from you.

We may also collect personal information from third parties in ways that you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number, superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions.

We may also collect relevant information from third-party sources such as LinkedIn and other professional websites.

### ***Shareholders***

We (or a share registry provider we may engage) may also collect information to maintain shareholder information per stock exchange requirements (where applicable), such as:

- The name of the individual shareholder and any trustee.
- Personal details relating to any Power of Attorney (e.g. the attorney's name, address, occupation, date of birth and phone number).
- Bank account details
- Your Security Reference Number (SRN) or Holder Identification Number (HIN).

When we collect personal information from shareholders, we may also use and disclose it for other reasons related to your shareholding, such as identity verification, providing shareholder services, sending you correspondence and documents and responding to complaints or inquiries. We may also use your information to market our products and services, such as exclusive shareholder offers, to you.

### ***Other individuals***

We may collect personal information about other individuals who are not our clients. This includes members of the public who participate in events we are involved with; individual service providers and contractors; and other individuals who interact with us on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with us. Generally, it would include your first and last name, address, e-mail address, telephone number and details of payment mechanism, such as credit card details.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings that identify you.

In limited circumstances, we may collect information that is considered sensitive information. For example, if you are injured while participating in the services that we provide or at an event promoted or delivered by us, we may collect health information about you in an emergency or otherwise with your consent.

## **3 When we collect personal information**

We collect personal information from you:

- When you enter into discussions with us about potentially becoming a client with us.
- When you enter into our Client Agreement and any other related documentation to become our client.
- When you are using any application created by or for us, including but not limited to our myJarden application (App) or the Website and enter or upload information.
- When you apply for employment with us.
- When you contact or interact with us.

## **4 Why we collect personal information, and what we use it for**

We collect and use your personal information as necessary to carry out our business, assess and manage our client's needs and provide services. We may also collect information to fulfil administrative functions associated with these services, for example, billing, entering contracts with you and/or third parties and managing client relationships.

The purposes for which we usually collect and use personal information depend on the nature of your interaction with us but may include:

- To set up your account to use our services, including verifying your identity and the identity of any other authorised person (as defined in our Client Agreement).
- To provide our services including third-party integrated services, carrying out your instructions, and administering your account.
- To develop our understanding of our clients' preferences and interests in the services we offer.
- For our internal research, development and the optimisation of our services.
- To let you know about surveys, promotions and any marketing activities we may undertake from time to time, or other opportunities or matters relevant to your account, or ancillary services provided by us (you may opt out at any time).
- To let you know about changes and updates to our services, applicable terms and conditions between you and us and this privacy policy.
- To comply with our license requirements, regulations, laws and court orders in New Zealand and overseas, including laws relating to anti-money laundering and countering financing of terrorism legislation, and to prevent fraud or other crimes.
- For the purposes and uses described in applicable terms and conditions between you and us.
- To manage our relationship and/or services provided to you with you and exercise our rights under applicable terms and conditions between you and us.

## **5 How we hold personal information**

We store information in paper-based files and/or use other electronic record-keeping methods in secure databases (including trusted third-party storage providers based in New Zealand and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

We maintain physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

We endeavour to use encryption or other technologies to ensure the secure transmission and storage of information via the Internet. Users of our websites are encouraged to exercise care in sending personal information via the Internet.

We take steps to destroy or de-identify information that we no longer require.

## **6 Using and sharing your personal information**

The purposes for which we may use and disclose your personal information will depend on the services we are providing you or the purposes for which we are interacting with you.

We may provide your personal information to our employees, related companies, contractors, advisors, agents regulators, exchanges, courts, service providers and other third parties (including financial institutions), where permitted or we believe this is appropriate to help us with any of the purposes we have outlined above. We will take reasonable steps to ensure that those recipients do not use that personal information for any other purpose.

We may also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- Administering billing and payments and debt recovery.
- Planning, managing, monitoring, and evaluating our services.
- Quality improvement activities.
- Statistical analysis and reporting.
- Training staff, contractors, and other workers.
- Risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives).
- Responding to enquiries and complaints regarding our services.
- Obtaining advice from consultants and other professional advisers.
- Responding to subpoenas and other legal orders and obligations.

We may release personal information when we believe this is appropriate for legal compliance and law enforcement or will help prevent fraud, money laundering or other crimes (including to government agencies with statutory law enforcement responsibilities). To avoid doubt, we may disclose certain personal information where required under the NZX Rules.

We may also release personal information to enforce or apply our terms of use, and other applicable terms and conditions between you and us, or protect our company, our users, or others.

We can release personal information to third parties as instructed by you, as explained at the time of collection of the information and in other ways permitted by the Privacy Act.

## **7 Dealing with us anonymously**

We will provide individuals with the opportunity to remain anonymous or use a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for us to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in the events, programs or activities we manage or deliver.

## **8 Direct marketing**

We may use or disclose your personal information to inform you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt out at any time by contacting us using the contact details below.

If you opt out of receiving marketing material from us, we may still contact you concerning our ongoing relationship with you.

## **9 Disclosure of information overseas**

We work with clients, service providers, sponsors, and commercial interests across the globe. Your personal information will likely be disclosed to overseas recipients in countries including Australia, the United States, and the United Kingdom.

For the purposes of the Privacy Act, you have authorised us to make any disclosure permitted under the terms and conditions of your personal information to overseas recipients that may not be required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act.

Entities that are related entities of Jarden, or are otherwise affiliated with us, have operations in New Zealand, Australia, the United States and the United Kingdom. In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be in countries in the regions in which we and our related entities and affiliates operate.

## 10 **Right to access your personal information or seek correction of your personal information**

To find out what personal information we hold about you, to get a copy of that information, and/or request corrections to that information as outlined in the Privacy Act, or for any further information about this privacy policy, please contact Wealth Compliance at [compliance@jarden.co.nz](mailto:compliance@jarden.co.nz).

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors or discrepancies in the information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you to be inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances per the Privacy Act. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

## 11 **Where we receive information about others from you**

If you provide us with personal information about someone else, you must ensure that you have their consent to do so (including their consent to Jarden contacting them), so that, without us taking any further steps required by applicable data protection or privacy laws, we may collect, use, and disclose such information for the purposes we have described in this policy.

This means you must take reasonable steps when providing personal information so that the individual concerned is aware of and/or consents to this policy, including that:

- Their personal information is being collected.
- The purposes for which that information is being collected.
- The intended recipients of that information.
- The individual's right to obtain access to that information.
- Our identity, and how to contact us.

## 12 **How we interact with you over the Internet**

You may visit our Website without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to us will be managed per this privacy policy.

Our Website may contain links to third-party websites. We are not responsible for the content or privacy practices of websites that are linked to our Website.

## 13 **Cookies**

We may use cookies when you are on the Website. Cookies are small blocks of text stored on your device. They allow us to recognise you (or rather, your internet browser) as you move around our site, and if you return to our site later. Cookies cannot read your hard drive or command your computer to perform any action.

Cookies may be used for security to help us identify you, to provide you with personalised features and for tracking traffic on our site. Any information we collect and share with third parties through cookies is aggregated and therefore anonymous (when shared with third parties, it does not include personal information that is likely to identify you).

You can prevent new cookies from being installed and delete existing cookies. The procedure depends on which browser you are using. For information on how to remove cookies check your internet browser. You may be unable to access certain pages on our Website or use Direct Broking unless you accept cookies.

#### 14 **Analytics**

To improve our Website and services we may use patterns and other meaningful information gathered from website analytics tools. This may include the timing and frequency of your use of the Website, your IP address, page requests, form requests, mouse click activity and other information that you voluntarily enter into the Website.

In addition, we may use third-party cookies from third-party services such as Google Analytics and/or Microsoft Application Insights. These services give us insight into behavioural information relating to users' interests in our services, on an anonymous and aggregate level. This helps us to understand browsing behaviour to give a better experience whilst using our services.

You can access Google's Privacy Policy [here](#) and Microsoft's Privacy Policy [here](#).

#### 15 **Complaints about the handling of your personal information**

You may contact us at any time if you have any questions or concerns about this privacy policy or about how your personal information has been handled.

You may make a complaint about privacy to the Privacy Officer at the contact details set out below.

The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps that can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate, and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that we may have breached the Privacy Act, a complaint may be made to the Office of the Privacy Commissioner (the Office of the Privacy Commissioner can be contacted by telephone on 0800 803 909 or by using the contact details on the Website [www.privacy.org.nz](http://www.privacy.org.nz)).

#### 16 **How you can contact us**

The contact details for the Jarden Privacy Officer are as follows:

Nichola Hiatt

[Nichola.hiatt@jarden.co.nz](mailto:Nichola.hiatt@jarden.co.nz)

<b>Version Control</b>			
Version	Date	Author	Rationale
1.0	22.01.24	Nichola Hiatt	Update Jarden Wealth
1.0	05.02.24	Andy Ward	Minor Updates

<b>Peer Review and Document Approval</b>			
Version	Date	Approved By	Position
1.0	05.02.24	Nichola Hiatt	General Counsel