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Approval of the Policy Manual:

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Privacy Policy

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Why is this policy important?



Agencies - that is almost everyone holding personal information about others - must comply with the Privacy Act. This Privacy Policy shows our customers how seriously we take the security of their personal information, and how we deal with collecting, using and disclosing personal information for anyone using our services. The Privacy Act defines principles we need to comply with, including the principle that we can only use information for the purposes for which we collected it. The systems we use to hold client information include: email, Dropbox, online services such as Finergy, third party providers such as XPlan, Quote Monster and Xero, and hard copy client files stored in the office.

Our policy - the dos and don'ts



- We ensure all information is kept securely.
- We only share and use information as per the agreed purpose.
- We only collect personal information necessary for the services being provided and ensure that the client knows that their information is available anytime they wish to view it.
- We ensure that client information is retained and stored in a secure environment.
- When we collect client information, we explain the reasons why the information is collected and how it will be used.



- We don't give out any personal information, unless we know exactly who's asking for it, why they want it and that they are authorised to have it.
- We respect confidentiality.
- We only collect and retain relevant information.
- All client information is kept secure and out of sight of others.



Our processes

Step 1	<ul style="list-style-type: none"> • Client meetings • We explain to our customer the purpose of collecting personal information about them. • We cover what we are trying to achieve and what personal information is needed to achieve it.
Step 2	<ul style="list-style-type: none"> • Client information • We only collect personal information directly from them or from a public source. • We only use their information to provide our services to them. • We are required to keep information for seven years after our client relationship ends. • We will dispose of it appropriately at the end of the seven-year period.
Step 3	<ul style="list-style-type: none"> • Client data • We will establish a process to periodically review the data that we hold in our business. • We only keep client data or information that we are required hold. This helps reduce our risk if client information is accidentally made public.
Step 4	<ul style="list-style-type: none"> • Systems • We check the terms and conditions or agreements with our systems providers to ensure that there are suitable arrangements in place to keep the data secure.
Step 5	<ul style="list-style-type: none"> • Insurance • On an annual basis, we will review the terms of our Professional Indemnity Insurance to ensure that we are insured for a breach of privacy.
Step 6	<ul style="list-style-type: none"> • Data breach • We will develop] a response plan for what to do if our business is affected by a data breach.

How do we know we comply?



- We periodically review the Privacy Commissioner's website for guidance on managing client privacy.
- We review the guidelines developed by the NZ Government to help prevent breaches of data. <https://www.cert.govt.nz/businesses-and-individuals/>
- When we use a new provider, we check their terms and conditions to understand how they store and use our client information and data.
- We maintain a Breach Register and we know how to record and manage a breach.

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Products and Services Policy

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Why is this policy important?



It is important that we apply the most suitable products or mix of products to meet the client's needs and to ensure their insurances and other financial products are suitable for short, medium and long-term purposes. We will achieve this by ensuring we understand our clients' needs and that our client understands the financial products and services that we recommend following our analysis of their needs.

Our policy- the dos and don'ts



- If any conflicts of interest arise, we will prioritise our customers interests ahead of our own.
- We make recommendations based on our research and the needs of our clients.
- We will use our knowledge of the product providers to recommend the best option for the client.
- If we are providing advice from a limited range of providers, we will ensure that this is made clear in the scope of our advice as well as when we present the recommendations.



- We only provide information that is factual and can be supported by research, policy wordings, and other appropriate evidence.
- We avoid the use of technical jargon or complex terminology that our client may not understand.



Our processes

Step 1	<ul style="list-style-type: none"> We identify our client's requirements and make recommendations on how best to achieve them.
Step 2	<ul style="list-style-type: none"> We provide enough information about the financial products we recommend enabling a client to make an informed decision.
Step 3	<ul style="list-style-type: none"> We make recommendations based on client needs and interests.
Step 4	<ul style="list-style-type: none"> We disclose and manage any potential conflicts of interest.
Step 5	<ul style="list-style-type: none"> We check our client's understanding of our advice throughout the process.

How do we know we comply?



- We ask our clients questions to test their understanding.
- We keep great records to show how we formed the basis of our advice.
- We undergo continuous training to understand the products and services we provide advice on.

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Record Keeping Policy

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Why is this policy important?



We are required to maintain adequate records, properly provide services to clients and provide information to the FMA in a timely manner. We must retain all documents required to be kept by law under the FMC Act and regulations, the AML/CFT Act 2009 and other relevant legislation.

Our policy- the dos and don'ts



- We keep all records securely and within easy access.
- We keep records for at least seven years after the client relationship ends
- Our client agreements contain client consent for the FMA to view our records.



- We retain client records for seven years even if they are no longer doing business with us.
- We avoid shortcuts with recording client information.



Our processes

Step 1	<ul style="list-style-type: none"> • We take sufficient notes, detailed enough for a person to be able read and understand the advice and why it was given.
Step 2	<ul style="list-style-type: none"> • We keep records in hard and/or soft copy for a minimum of seven years after the client relationship ends.
Step 3	<ul style="list-style-type: none"> • When key changes are made (such as changes to insurance policies) we record why the change was made and the rationale for the change.
Step 4	<ul style="list-style-type: none"> • Records are easily accessible, kept in a secure fireproof location and soft copies are regularly backed up.

How do we know we comply?



- We complete annual checks to ensure that our records are complete. This includes destroying records that we are no longer required to keep.
- We complete a periodic review of our record keeping processes.

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Service Providers and Outsourcing Policy

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Why is this policy important?



We use service providers such as lawyers, accountants, compliance consultants and email centres to provide our business with professional advice or services. We only use suitably qualified people to provide advice and services for our business. When we outsource a function of our licence, that service provider is performing some of the licensed activities for our business. Therefore, we need to ensure that they meet certain standards so that we comply with our licence obligations.

Our policy- the dos and don'ts



- We have written agreements in place with our providers that set out the roles and responsibilities.
- We periodically monitor that the terms of the agreement are being met.



- We don't assume all providers will be working as we want or expect.



Our processes

Step 1	<ul style="list-style-type: none"> • We consider compliance, contractual and legal requirements when selecting an external provider.
Step 2	<ul style="list-style-type: none"> • When we select our provider, we complete checks on them to ensure that they are reputable, suitably qualified and there are no warning signs that they could go out of business soon.

How do we know we comply?



- We keep in regular contact with our providers and talk to them about any changes in their business.
- We monitor our service level agreements and ensure our providers are meeting them.

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