

Privacy Policy

Version Control

Policy Version	Date Issued	Authorised By	Overview of Change
Version 1.0	March 2025		

1. Purpose

- 1.1 To ensure that all staff understand the requirements and expectations regarding the protection of personal information.
- 1.2 To outline the manner in which Geneva Finance will deal with breaches of this policy and the consequences for failing to follow this policy and/or other associated policies.

2. Scope

- 2.1 This policy applies to Geneva Finance Ltd and all its subsidiary companies and businesses. Any reference to "Geneva" is understood to include all entities owned or controlled by Geneva Finance Ltd, unless stated otherwise.

3. Policy Statement

- 3.1 Geneva is strongly committed to protecting personal information. This privacy policy describes why and how we collect and use personal information and provides information about individuals rights.
- 3.2 It applies to personal information provided to us, both by individuals themselves or by others. We may use personal information provided to us for any of the purposes described in this privacy policy or as otherwise stated at the point of collection.
- 3.3 Personal information or personal data is information about an identifiable individual. When "you" or "your" are used in this statement, we are referring to the relevant individual who is the subject of the personal information.
- 3.4 Processing is how we sometimes refer to the handling, collecting, protecting or storing of your personal information.
- 3.5 When collecting and using personal information, our policy is to be transparent about why and how we do that. Additionally, our website(s) includes a privacy statement outlining how we manage personal data.

4. Collection of personal information

- 4.1 Geneva collects, holds and processes personal information from customers, suppliers, employees, job applicants, contractors and other individuals. We collect and hold this information for our necessary business purposes.

4.2 The types of personal information we collect, hold and process include:

- a) the contact details and organisational roles of our actual and prospective customers, suppliers and other business contacts. Typically, this information includes names, addresses, telephone numbers, e-mail addresses and job titles.
- b) Personal information collected in the course of providing products and services to our customers (for instance financial details if we are engaged to perform financial services, or credit information).
- c) Personal information collected when individuals communicate with us (including via email).
- d) Personal information collected from job applicants when they apply for a job with us and individual contractors when performing a role for us (in some instances this may include sensitive information such as health information if related to the role being applied for or being performed).
- e) Personal information collected from our employees during the course of carrying out our duties and activities as an employer (in some instances this may include sensitive information such as health information if related to the employee's role).
- f) We might also collect general user information such as users internet protocol addresses, browser type and internet service provider details and other technical information when you visit our associated websites.

4.3 We generally do not intend to collect, and we ask you not to submit, any sensitive personal information. Sensitive personal information includes information about an individual's race or ethnic origin; political opinions or political affiliations; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data that uniquely identifies someone; sexual life or sexual orientation; and criminal records.

4.4 However, in certain circumstances, such as processing life insurance or credit contract insurance claims, we may need to collect and use this information to assess and manage claims appropriately. Any sensitive data collected will be handled in strict compliance with privacy laws and our internal security measures to protect your information.

4.5 If you choose to provide sensitive personal information about yourself to us for any reason, the act of doing so constitutes your explicit consent, (where such consent is necessary), for us to collect and use that information as necessary in the ways described in this privacy policy or as described at the point you choose to disclose this information.

4.6 We collect most information directly from individuals when we or an authorised agent deal with them. The personal information we collect may be provided in forms filled out by individuals, face to face meetings, email messages, telephone conversations, when you use our websites or our social media, or by third parties. If you contact us, we may keep a record of that contact.

4.7 Because of the nature of our business, it is generally impracticable for us to deal with individuals on an anonymous basis or through the use of a pseudonym, although sometimes this is possible (for example, when seeking staff or client feedback generally).

5. Our legal grounds for processing personal information

5.1 We rely on one or more of the following conditions to justify processing personal information:

- a) our legitimate interests in the effective delivery of information and services to you and in the lawful operation of our businesses and the legitimate interests of our customers in receiving services from us (provided these do not interfere with your fundamental rights);
- b) our legitimate interests in developing and improving our businesses, services and offerings and in developing new Geneva technologies and offerings (provided these do not interfere with your fundamental rights);
- c) our legitimate interests in maintaining the security of our and our client's data and in ensuring the quality of our services;
- d) to satisfy any requirement of law or regulation;
- e) to perform our obligations under a contractual relationship with you; or
- f) where no other processing condition is available, if you have agreed to us processing your personal information for the relevant purpose.

6. Why we process personal information

6.1 The primary purposes for which we collect, hold and process personal information are:

- a) to provide services to our customers: we provide a diverse range of services to our customers, several of which require us to collect and process personal information in order to provide our services.
- b) to respond to an individual's request;
- c) to communicate and maintain contact with customers;
- d) administering and managing our business and services: This includes:
 - i) managing our relationship with customers and prospective customers;
 - ii) managing our business and services (such as identifying client needs and improvements in service delivery);
 - iii) analysing and evaluating the strength of interactions between Geneva and our customers;
 - iv) performing analytics, including producing metrics for Geneva leadership, such as trends, relationship maps, sales intelligence and progress against the business goals;
 - vi) administering and managing IT systems, websites and applications;
 - vii) providing our customers and prospective customers with information about us and our range of services that we think will be of interest;

- viii) for general management and reporting purposes, such as invoicing and account management;
- viii) for recruitment purposes;
- ix) for purposes related to the employment of our personnel and providing internal services to our staff;
- x) security, quality and risk management activities: we have security measures in place to protect our and our client's information (including personal information), which involves detecting, investigating and resolving security threats. This may include:
 - xi) automated scans to identify harmful emails;
 - xii) monitoring the services provided to customers for risk and quality purposes, which may involve processing personal information stored on the relevant client file.
 - xiii) carrying out conflict and risk searches to ensure there are no issues that would prevent us from working with a particular customer (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputation issues);
 - xiv) complying with any requirements of law and regulation; and
 - xv) other purposes related to our business.

6.2 If you choose not to provide us with personal information which we have requested from you, we may be unable to fulfil any of the above purposes, including providing products or services to you, responding to your requests, assessing or paying insurance claims, paying your invoices or processing your application for employment.

6.3 We may collect, hold and use personal information about individuals to market our services, including by email. However, individuals always have the opportunity to elect not to receive further marketing information from us by writing to the Privacy Officer at privacyofficer@genevafinance.co.nz Please allow 20 working days for your request to be processed.

6.4 Alternatively, if we have contacted you by email, you may use the unsubscribe function in that email to notify us that you do not want to receive further marketing information from us by email.

6.5 If we collect, hold or use personal information in ways other than as stated in this policy, we will ensure we do so pursuant to the requirements of the Privacy Act.

7. Disclosure of personal information

7.1 Geneva does not disclose personal information unless:

- a) disclosure is permitted by this policy;
- b) we believe it is necessary to provide you with a product or service which you have requested (or, in the case of a partner, employee or contractor of Geneva, it is necessary for maintaining, or is related to, your role at Geneva);

- c) to protect the rights, property or personal safety of any member of the public or a customer of Geneva or the interests of Geneva;
- d) some or all of the assets or operations of Geneva are or may be transferred to another party as part of the sale of some or all of Geneva's business;
- e) you give your consent; or
- f) such disclosure is otherwise required or permitted by law, regulation, rule or professional standard.

7.2 We may also disclose personal information under the following circumstances:

- a) to our professional advisers, for example, law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business;
- b) when explicitly requested by you;
- c) when required to deliver publications or reference materials requested by you;
- d) when required to facilitate conferences or events hosted by a third party; or
- e) to third party contractors, subcontractors, and/or their subsidiaries and affiliates (for example independent contractors and consultants, travel service providers, mail houses, off-site security storage providers, information technology providers, event managers, credit managers, debt collecting agencies, providers of identity management, website hosting and management, data analysis, data backup, security and cloud storage services).

7.3 We may also share non-personal, de-identified and aggregated information for research or promotional purposes. Except as set out in this policy, we do not sell to or trade personal information with third parties.

7.4 Please note, in accordance with the above, sometimes individuals and organisations outside of Geneva will have access to personal information held by Geneva and may collect or use it from or on behalf of Geneva. Some of these third-party providers may use their own third party subcontractors that have access to personal information (sub-processors). It is our policy to use only service providers and third-party providers that are bound to maintain appropriate levels of security and confidentiality, to process personal information only as instructed by Geneva and in accordance with our privacy guidelines and not to keep, use or disclose personal information we provide to them for any unauthorised purposes. We also require the flow of those same obligations down to their sub-processors.

7.5 We will only share personal information with others when we are legally permitted to do so.

8. Retention

We retain personal information for as long as is necessary for the purpose for which it was collected and in accordance with our Retention Policies. Personal information may be held for longer periods

where extended retention periods are required by law or regulation and as necessary in order to defend our legal rights.

9. Privacy on our Web Sites and Applications

9.1 In addition to personal information you provide to us directly (such as where you make a direct request to us or complete an application form), this policy also applies to any personal information we collect via our websites, including www.genevafinance.co.nz & www.questinsurance.co.nz and mobile applications.

9.2 In order to properly manage our websites and applications, we may log certain statistics about the users of these facilities, for example the users domains and browser types. None of this information specifically identifies an individual and it is used solely to ensure that our websites and applications provide the best possible navigational experience for users.

9.3 Cookies and web beacons are used on some Geneva websites.

9.4 Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. If you are uncomfortable with the use of cookies, you can manage and control them through your browser, including removing cookies by deleting them from your 'browser history' (cache) when you leave the site. In most cases, you can refuse a cookie and still fully navigate the Geneva websites.

9.5 A web beacon is a clear picture file used to keep track of your navigation through a website. Along with cookies, web beacons help us gain an understanding of how users of Geneva websites navigate through and process the content contained in those websites. On occasion Geneva will advertise on third party websites. As part of the tracking process for advertising campaigns we may at times use web beacons to count visitors who have come to the Geneva websites after being exposed to Geneva advertising on a third party site.

9.6 We do not use this technology to access your personal information.

9.7 Because Geneva wants your user experience to be as informative and resourceful as possible, we provide a number of links to websites and embedded content operated by third parties that may also set cookies and web beacons. Geneva is not responsible for the privacy practices or policies of those sites. We encourage you to review each website's privacy policy, especially if you intend to disclose any personal information via that site. A link to another non-Geneva website is not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that site or advertised on that site.

10. Security of Personal Information

10.1 Geneva will endeavour to take all reasonable steps to keep secure any information which we hold about you, whether electronically or in hard-copy, and to keep this information accurate and up to date. We also require our employees and data processors to respect the confidentiality of any personal information held by Geneva.

10.2 Geneva aims to achieve industry best practice in the security of personal information which it holds. We have a framework of policies, procedures and training in place covering data

protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

11. Access to Information

- 11.1 We will provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted for us to withhold this information.
- 11.2 When you make a request to access personal information, we will require you to provide some form of identification (such as driver's licence or passport) so we can verify that you are the person to whom the information relates. In some cases we may also request an administrative fee to cover the cost of access.
- 11.3 If at any time you want to know what personal information we hold about you, you may contact us by emailing us at privacyofficer@genevafinance.co.nz

12. Agent and contact information

Where we process or hold personal information solely on behalf of another organisation, we do so as an "agent" under the Privacy Act. Where we process, use or disclose personal information for our own purposes, or for purposes related to our business, we will be an agency governed by the Privacy Act. If you have any questions about this privacy policy or how and why we process personal information, please contact us at:

Privacy Officer: email at privacyofficer@genevafinance.co.nz

13. Corrections and Concerns

- 13.1 If you believe that information we hold about you is incorrect or out of date, or if you have concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns. You can direct any requests for correction or concerns to our Privacy Officer via email to privacyofficer@genevafinance.co.nz
- 13.2 If Geneva becomes aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact our Privacy Officer. If you are not satisfied with our handling of your problem or complaint you may make a complaint to the Office of the Privacy Commissioner (<https://www.privacy.org.nz/about-us/contact/>).

14. Employee Responsibilities and Obligations

Employees must comply with this Privacy Policy and ensure the protection of personal and sensitive information. This includes handling data responsibly, accessing it only for legitimate business purposes, and maintaining confidentiality at all times. If an employee becomes aware of a potential privacy breach, they must immediately report it to the Company Privacy Officer for investigation and resolution.

Examples of reportable incidents include:

- a) Unauthorised Access - If an employee or external party accesses personal or sensitive information without proper authorization.
- b) Lost or Stolen Data - If a device containing personal information (e.g., laptop, USB drive, or mobile phone) is lost or stolen.
- c) Accidental Disclosure - If personal information is sent to the wrong recipient via email, mail, or other communication channels.
- d) Cybersecurity Incidents - If there is a suspected phishing attack, hacking attempt, or malware that may compromise personal data.
- e) Improper Disposal - If documents or electronic records containing personal information are not securely destroyed or deleted.
- f) Third - Party Breach - If a vendor, partner, or contractor handling company data experiences a security incident that could impact personal information.

Employees must report any suspected breaches immediately to ensure prompt investigation and mitigation. Failure to adhere to this policy may result in disciplinary action.

15. Policy Amendments

Geneva Finance is entitled to amend and vary its policies from time to time at Geneva Finance's sole discretion and our employees are required to observe such policies.

Related policy, Quest Policy Standard.