

# Privacy Policy Document

## PRIVACY POLICY

This Privacy Policy sets out how Gregan & Company Limited (**'Gregan & Co'**) uses and protects any information you give Gregan & Co when you use their website or their services.

Gregan & Co are committed to protecting the privacy of its clients and visitors to their website in accordance with the [Privacy Act 2020](#). This Privacy Policy describes what information we gather, how we use it, what we do to protect it and to assist you in making informed decisions about using our services.

## YOUR CONSENT

By accessing and using our website or our Services, you accept our Privacy Policy and consent to the collection, use, storage and disclosure of your personal information in accordance with this Privacy Policy. Each time you visit our website, or use our Services, and any time you voluntarily provide us with information, you agree that you are consenting to our collection, use and disclosure of the information that you provide, and you are consenting to receive emails or otherwise be contacted, as described in this Privacy Policy.

## WHAT PERSONAL INFORMATION WILL WE COLLECT AND HOLD?

Personal Information is defined in the Privacy Act as information about an identifiable individual (a natural person as opposed to a company or other legal entity).

The kinds of personal information we collect from you or about you depend on the transaction you have entered into with us, the services you or your organisation have contracted us to provide, and the services you or your organisation are interested in.

We mainly collect personal information directly from you when you:

- Communicate or interact with us, whether by email, telephone or a video call (such as Microsoft Teams, Zoom or Skype);
- Fill out forms;
- Contact us through our website;
- Engage us to provide the Services.

Generally, the types of personal information that we may collect and hold:

- Your name, date of birth and copies of identification to evidence those details;
- Contact details such as residential address, telephone / mobile number and email address;
- Payment information such as bank account or credit card details;
- Details relating to your use of any product and/or service offered by us, details of your enquiry and any preferences you tell us about such as preferred contact methods.

We may also collect information about you from:

- Publicly available sources e.g. via the internet;
- Your professional advisers e.g. your accountant or lawyer, where we have received your express consent to do so. We are not responsible for the privacy or security practices of your professional advisers and they are not covered by this Privacy Policy.

If you do not provide the information we have requested, then we may not be able to answer your enquiry, complete the transaction you have entered into, or provide the Services you have engaged us to provide.

## ONLINE DEVICE INFORMATION AND COOKIES

If you are visiting us through our website, then we collect information about your use and experience on these by using cookies. Cookies are small pieces of information stored on your hard drive or on your mobile browser. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

The cookies we send to your computer, mobile phone or other device cannot read your hard drive, obtain any information from your browser or command your device to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Gregan & Co website or app.

When you interact with us through our website the information collected through the cookies may include:

- The date and time of visits
- Website page (or pages) viewed
- The website from which you accessed the internet and our website or other digital platform
- How you navigate through the website and interact with pages (including any fields completed in forms and applications completed (where applicable))
- Information about your location
- Information about the device used to visit our digital platform
- IP address (or addresses), and the type of web browser used

We will not ask you to supply personal information publicly over any social media platform that we may use. We may invite you to send your details to us through a private message, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions, but we would require your express consent prior to us including you in such activities.

## PURPOSE OF COLLECTION AND USE OF PERSONAL INFORMATION

Any personal information you provide to us may be used to:

- Check whether you are eligible for the product or services offered by us;
- Facilitate those services;
- Provide information that you request; and / or
- Provide you with further information about our other products and services.

We also have an obligation to maintain personal information to disclose to regulatory and similar bodies who have a legal right to such information.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

We may disclose your personal information to others outside Gregan & Co where:

- It is necessary to enable us to achieve the purposes that we collected the information for;
- We are required or authorised by law or where we have a public duty to do so;
- You have expressly consented to the disclosure or your consent can be reasonably inferred from the circumstances; or
- We are permitted to disclose the information under the [Privacy Act 2020](#).

Your personal information may be used by us for the purpose of providing advice and services to you and may also be used by agencies such as, but not limited to:

- Cloud-based service providers (to store your information securely);
- Third-party suppliers (e.g. insurers, agents, loss adjusters, risk managers, investment managers, researchers, technology service providers, mailing houses etc.) to carry out specialised activities.
- Third-party if we are required to comply with any laws in New Zealand or overseas that apply to us, to you, or the services we provide (e.g. [Financial Services Complaints Limited](#) ('FSCCL'), our external dispute resolution service, [Financial Markets Authority](#) ('FMA'), our regulator etc.);
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event; and
- Credit reporting and debt collecting organisations.

Where your personal information is provided to these third parties to enable them to perform their agreed activities, they are required to abide by the Privacy Act and use the personal information provided for the sole purpose of supplying their specific services. To this end, we make sure that appropriate security and information handling arrangements are in place and the information remains subject to confidentiality obligations.

All countries have different privacy laws and information protection standards. If we need to send your personal information to a country that has lower standards of information protection than in New Zealand, we will take appropriate measures to protect your personal information. Where it is not possible to ensure that appropriate security and information handling arrangements are in place, we will let you know and gain your consent prior to sending your personal information overseas.

If we don't need to share your information with a third party in order to provide advice and services to you, we will not pass on your information to them without your consent. Under no circumstances will we sell or receive payment for disclosing your personal information.

## STORAGE AND PROTECTION OF PERSONAL INFORMATION

Some information we hold about you will be stored in paper files, but most of your information will be stored electronically on physical hard drives and/or on the cloud, by cloud-based service providers. We will take all reasonable steps to keep your personal information secure and prevent unauthorised disclosure.

However, we cannot promise that your personal information will not be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur. If we provide you with any passwords or other security devices, it is important that you keep these confidential and do not allow them to be used by any

other person. You should notify us immediately if the security of your password or security device is breached, this will help prevent the unauthorised disclosure of your personal information.

We use the following physical and electronic security measures to protect the security of the personal information we hold:

- Access to information systems is controlled through identity and access management;
- Our buildings are secured with a combination of locks, monitored alarms and cameras to prevent unauthorised access;
- Employees are bound by internal information security policies and are required to keep information secure;
- Employees are required to complete training about information security and privacy;
- When we send information overseas or use service providers to process or store information, we put arrangements in place to protect your information;
- We regularly monitor and review our compliance (and our service providers' compliance) with internal policies and industry best practice.

We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirement. In the case of information that relates to our advice services or products or services we have provided, we are required by law to hold this information for seven years. After this time, provided that the personal information is no longer relevant to any service we are providing you, we will take reasonable steps to safely destroy or de-identify any personal information.

## BREACHES OF YOUR PRIVACY

We work hard to keep your personal information safe. However, despite applying strict security measures and following industry standards to protect your personal information, there is still a possibility that our security could be breached. If we experience a privacy breach, where there is a loss or unauthorised access or disclosure of your personal information that is likely to cause you serious harm, we will, as soon as we become aware of the breach:

- Seek to quickly identify and secure the breach to prevent any further breaches and reduce the harm caused;
- Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals;
- Advise and involve the appropriate authorities where criminal activity is suspected;
- Where appropriate, notify any individuals who are affected by the breach (where possible, directly);
- Where appropriate, put a notice on our website advising our clients of the breach; and
- Notify the Privacy Commissioner.

## HOW CAN YOU CHECK, UPDATE OR CHANGE THE INFORMATION WE ARE HOLDING?

You have the right to request access to, correct and, in some circumstances, delete your personal information.

You can do so by contacting Mark Gregan, our Managing Director:

Gregan & Company Limited  
PO Box 11704  
Ellerslie  
Auckland 1542  
Email: [insure@gregan.co.nz](mailto:insure@gregan.co.nz)  
Website: [gregan.co.nz](http://gregan.co.nz)

Upon receipt of your written request and enough information to allow us to identify you, we will disclose to you the personal information we hold about you.

We will amend or delete any personal information that we agree is inaccurate.

We are only able to delete your personal information to the extent that it is not required to be held by us to satisfy any legal, regulatory or similar requirements.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access or to correct or delete your personal information, we will let you know our reasons, except if the law prevents us from doing so.

If we refuse your request to correct or delete your personal information, you have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access, correct or delete your personal information, we will also provide you with information on how you can complain about the refusal.

We will not charge you for providing access to your personal information.

## PRIVACY POLICY QUERIES AND CONCERNS

We welcome your questions and comments about privacy. If you have any concerns or complaints, please feel free to contact Mark Gregan, our Managing Director:

Gregan & Company Limited  
PO Box 11704  
Ellerslie  
Auckland 1542  
Email: [insure@gregan.co.nz](mailto:insure@gregan.co.nz)  
Website: [gregan.co.nz](http://gregan.co.nz)

We will acknowledge your complaint within three working days of its receipt. We will let you know if we need any further information from you to investigate your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five working days, but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are not satisfied with our response to any privacy related concern you may lodge a complaint on the Privacy Office website ([www.privacy.org.nz](http://www.privacy.org.nz)) or send a complaint form to the Privacy Commissioner at:

Office of the Privacy Commissioner  
PO Box 10-094  
Wellington 6143  
Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)  
Website: [www.privacy.org.nz](http://www.privacy.org.nz)  
Telephone: 0800 803 909

## **AVAILABILITY OF INFORMATION**

This information can be provided in hardcopy at your request.

This Privacy Policy statement was prepared on: 14 June 2022