

**Frontier Services Limited (Trading as MyMoney “FSL”)** we, us, our) complies with the Privacy Act 2020 (“the Act”) and if applicable, the European Union’s General Data Protection Regulations, when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

This policy sets out how we will collect, use, disclose and protect your personal information.

This policy does not limit or exclude any rights under the Act. There is more information on the Act at the Office of the Privacy Commissioner.

## **Who We Collect Your Personal Information From**

We collect personal information about you from:

- As you provide that personal information to us, including via the website and any related service, through any registration or subscription process, through any contact with us (eg telephone call, email or in person), or when you use our services and products
- Third parties where you have authorised this or the information is publicly available
- Where possible, we will collect personal information from you directly.

## **What personal information do we collect about you**

We collect personal information in order to carry out the functions and activities required to provide our services to you. For example, if we are providing you with advice we will ask you a range of questions and collect information from you so that we have a good understanding of your financial position and objectives. This information may include:

- Your name and date of birth

- Your email address, postal address, residential address and contact telephone numbers
- Financial information, such as your bank account number, your tax status and associated tax identifying numbers, your financial goals and objectives, your current and past personal financial circumstances, including information relating to your assets, liabilities and investments, and any other information that we may request or require in order to obtain a full understanding of your personal financial circumstances and objectives
- Specific documents to verify your identity and other personal information
- Information required to determine your suitability for the services we offer
- Information about which of our services you use and how you use those services including the activities and transactions you undertake
- Any correspondence between us and you
- Preference information such as your marketing preferences
- Information required to satisfy our legal and regulatory obligations

## **How We Use Your Personal Information**

We may use your personal information:

- To provide services and products to you
- To verify your identity
- To market our services and products to you, including contacting you electronically (eg by text or email for this purpose)
- To improve the services and products that we provide to you
- To undertake pre-employment credit checks on prospective employees
- To bill you and to collect money that you owe us.

- To respond to communications from you, including a complaint
- To conduct research and statistical analysis (on an anonymous basis)
- To protect and/or enforce our legal rights and interests, including defending any claim
- To comply with our legal and regulatory obligations
- For any other purpose authorised by you or the Act
- Disclosing Your Personal Information

We may disclose your personal information to:

- Financial institutions that we engage with for the purposes of providing our service to you, such as our Custodian
- Third parties to meet our regulatory or legal obligations and for the purposes of carrying out checks to satisfy our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009
- External and professional service providers that provide services to us
- Other third-parties (for anonymous statistical information)
- A person who can require us to supply your personal information (eg a regulatory authority)
- Any other person authorised by the Act or another law (eg a law enforcement agency)
- Any other person authorised by you
- Entities that acquire an interest in us
- Some of the parties that we may disclose your personal information to may be located overseas. We require these entities to adhere to our standards of privacy, security and confidentiality.

**How do we safeguard your information?**

We take great care in implementing and maintaining the security of the Site and your information. We employ industry standard procedures and policies to ensure the safety of the information we collect and retain, and prevent unauthorised use of any such information, and we require any third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take all reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorised access or abuse our Site, and we make no warranty, express, implied or otherwise, that we will prevent such access. As required under the Act if there is a data-breach of our Site we will notify our clients immediately and the required authority.

### **Accessing and Correcting Your Personal Information**

You may request a copy of the personal information that we hold about you. You may also require that we correct personal information that we hold about you if that information is misleading, inaccurate, incomplete or irrelevant. These requests can be made by contacting us at [stephen@mymoney.net.nz](mailto:stephen@mymoney.net.nz)

We may refuse your request for a copy of the personal information that we hold about you or your request to correct your personal information in one of the following circumstances:

- Access would be unlawful
- Access would prejudice enforcement action or actions relating to unlawful activity or serious misconduct
- Denying access is required under New Zealand law or an order of a court or tribunal
- When you make a request to access personal information, we may require you to provide some form of identification (such as driver licence or passport) so we can verify that you are the person to whom the information relates. We will be able to provide the requested information free of charge and within 10 working days.

### **Email Communications**

We only send email to those who want to receive it. If you would not like to receive future emails from us, please use the “unsubscribe” link that is located at the bottom of our marketing communications or contact us via email to [stephen@mymoney.net.nz](mailto:stephen@mymoney.net.nz).

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important e-mail communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

FSL recognises the importance of safeguarding your personal information. Please contact us to talk to us about your personal information or the communication we send you. We are happy to provide you with any personal information that we hold about you. If it is wrong, we will correct it.

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

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site’s privacy policy before you provide personal information.

## **Minors**

We understand the importance of protecting children’s privacy, especially in an online environment. The Site is not designed for or directed at children. Under no circumstances shall we allow use of our services by minors without prior consent or authorisation by a parent or legal guardian. We do not knowingly collect Personal Information from minors. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at 09 377 4433.

## **Cookies**

FSL does use technologies such as cookies. Cookies are small pieces of information or data that the website can send to your browser, which may then be stored on your computer's hard drive (persistent cookies) or its memory (session cookies). Cookies help FSL understand which parts of our website are the most popular, where our visitors are going and how long they spend there. We use cookies to learn how we can make our website more useful and interesting for you. You may be able to adjust your browser settings to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it.

## **Website Tracking and Measurement**

FSL uses third-party website trackers, such as Google Analytics, to collect information on how you use our website. These services are used to aggregate website statistics anonymously, such as number of page views, the number of unique visitors, time spent on our site, and to determine advertising effectiveness.

## **Online Advertising**

FSL uses third-party vendors, such as Google Ads, to display advertising on websites across the internet. These third-party vendors may also use cookies to anonymously track and target advertising based on your browsing behaviour.

FSL uses remarketing with [Google Analytics](#) and [Google Ads](#) to advertise online. Third-party vendors, including Google, show FSL ads on sites across the internet. FSL and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimise, and serve ads based on a user's past visits to the FSL website.

FSL uses Google Display Network Impression reporting and the DoubleClick Campaign Manager. FSL and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) together to report how ad impressions, other

uses of ad services, and interactions with these ad impressions and ad services are related to visits to the FSL website.

FSL uses Google Analytics Demographics and Interest reporting, including age, gender, and interests. This is aggregated website traffic information collected by our web server or third party systems we subscribe to.

Visitors can opt out of Google Analytics for Display Advertising and customise Google Display Network ads using the [Ads Settings](#).

Google Analytics collects information such as how often users access the Site, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Site and services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Site is restricted by the Google Analytics [Terms of Use](#) and the [Google Privacy Policy](#).

## **User Rights**

You may request to:

1. Receive confirmation as to whether or not personal information concerning you is being processed, and access your stored personal information, together with supplementary information.
2. Receive a copy of personal information you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your personal information that is in our control.
4. Request erasure of your personal information.
5. Object to the processing of personal information by us.

6. Request to restrict processing of your personal information by us.
7. Lodge a complaint with a supervisory authority.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

If you wish to exercise any of the aforementioned rights, or receive more information, please contact our Data Protection Officer (“DPO”) using the details provided below:

#### Physical Address

139 Stonefields Ave, Stonefields, Auckland

#### Postal Address

As above

#### Phone & Email

Phone: 09 3774433

Email: [stephen@mymoney.net.nz](mailto:stephen@mymoney.net.nz)

#### **Updates or amendments to this Privacy Policy**

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised Privacy policy. The last revision of this Privacy policy was the 1st December 2020. Your continued use of the Platform, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.