

### Policy Statement

Collinson & Co's Privacy Policy sets out how we collect, use, protect and share your personal information. Protecting client privacy and keeping client personal information confidential is important to us. The material collected and retained by Collinson & Co is confidential and sensitive. All staff and contractors must take extreme care to protect client privacy and abide by the relevant privacy legislation. This policy should be read in conjunction with the Code of Conduct.

### Policy

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This Policy explains:

- How Collinson & Co (We/us) collect and hold your personal information;
- What kinds of personal information Collinson & Co will collect and hold about you;
- The purposes for which Collinson & Co collects, holds, uses and discloses your personal information;
- Who Collinson & Co is likely to disclose personal information to;
- How you may access and ask for correction of your personal information held by Collinson & Co;
- The complaints process that Collinson & Co has in place if you have privacy concerns.

Personal information may be collected in respect to work conducted for various clients and organisations. A confidentiality agreement will be put in place, where deemed to be necessary by the Risk & Compliance Committee, between clients/suppliers/contractors and ourselves.

Collinson & Co staff must not use the information without taking reasonable steps to ensure it is accurate, up-to-date, complete, relevant and not misleading.

Client(s) mean any client(s) under the entities covered by this Policy.

### Collinson & Co entities covered by this Policy

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This Policy applies to the related companies operating under the trading name "Collinson & Co":

- Collinson Crowdfunding Limited (CCF)
- Collinson Forex Limited (CFX)
- Direct FX Limited (DFX)

### Collecting your personal information

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We normally collect personal information directly from you. You will provide us with information when you open an account with us, complete an application form whether a physical form or online form, meet us in person or speak to us over the phone, send us a letter or email, or use our websites.

When you apply for an account with us, we may collect and hold information from you such as your name, date of birth, address, contact details, employment details, and your tax residence status, etc. As we provide you with our services, we collect and hold information about your transaction history with us.

We may collect information about you that is publicly available, including information from telephone directories, the electoral roll or other websites.

We may collect your personal information from the following third parties with your consent or if the information is publicly available:

1. Financial institutions involved in any transactions that you conduct through us;
2. Organizations that we have an arrangement with to share information in order to provide service to you, or for marketing purposes to promote a product or service;
3. Affiliate and other parties that may have introduced you to us.

We may collection information about how you use Collinson & Co and other websites to help us improve our services and products. We may do this when you visit our websites and a website where our services are advertised. The information we collect in this way is general information only derived from cookies, such as the number of visitors to the website, and does not identify you. We identify you when you log into an online Collinson & Co service.

### Applicable laws

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We may collect personal information from you because we are required by New Zealand law to collect that information.

#### **Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act):**

We are required by AML/CFT Act to conduct due diligence on our clients, we must collect your personal information to establish your identity and address. We may therefore ask you to show us documents verifying your identity and proof of address and retain copies of these documents. In cases that enhanced due diligence are required as per prescribed by relevant legislation, we must collect more information from you such as evidence of your source of funds or wealth.

#### **The Financial Transactions Reporting Act 1996 (FTR Act):**

We are required by FTR Act to verify your identity. We may do so by collecting your driver licence, passport, or any other qualified identity documents.

#### **Privacy Act 2020 (Privacy Act):**

We will take all reasonable efforts to ensure that you are aware that the information is being collected, what it will be used for, the recipients of the information, whether the supply of the information is voluntary or mandatory, the consequences of not providing the information, and your right to access and correct the information.

#### **Foreign Account Tax Compliance Act (FATCA) and Automatic Exchange of Information/Common Reporting Standard (AEOI/CRS):**

We are required by law to collect information about your tax residency status.

#### **General Data Protection Regulation (GDPR) (EU) 2016/679:**

GDPR only applies to our clients who reside in EU. Please contact us if you are a Collinson & Co client located in EU, GDPR protection will be enabled for you.

### Purpose for collecting, holding and using your personal information

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We only collect personal information where it is needed to perform a function or activity. The collection of the information is necessary for that purpose. Information collected for one purpose may not be used for another purpose without the permission of the supplier of the information.

We collect, holds and uses your personal information for the following purposes:

1. To open, operate, administer and maintain your account and all products and services provided to you by Collinson & Co, its bank counterparties, or related companies and affiliates.
2. To keep you informed of improvements to our services and products and to provide you with other relevant information about Collinson & Co, its products and services.

3. To fulfil our reporting obligations, including but not limited to Annual AML/CFT Report, SAR, STR, PTR, CRS, FATCA and any other reporting obligations imposed by New Zealand laws and regulations.
4. To confirm your identity and address, for example, electronically match your personal information with identification information on third party databases.
5. To prevent, investigate, monitor or screen any actual or suspected money laundering, financing of terrorism, fraud, crime or misconduct.
6. To manage your relationship with us, for example to respond to your queries, address any concerns or complaints that you raise against us, and to manage any legal action between you and us and collecting debts.
7. To perform other administrative and operational tasks, including risk management and systems development and testing, conduct market research, data processing and statistical analysis.
8. To comply with orders, summons, directions and written notices issued to us by a regulator or government agency with enforcement powers over Collinson & Co such as the Financial Markets Authority (FMA), Department of Internal Affairs (DIA), Inland Revenue (IRD) and Police, in execution of their statutory information gathering and enforcement powers.
9. For purposes as required by relevant laws, regulations and external payment systems.

### Consequences if your information is not provided

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If Collinson & Co is not able to collect your personal information, we may not be able to deal with you or provide you with products or services.

### Local and overseas recipients of your personal information

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Your information will not be disclosed except in certain situations, including where the disclosure is directly related to the purpose for which the information was collected, where the source of the information is a publicly available publication, where the disclosure is authorised by you, or the disclosure is required by law.

We may disclose your personal information to the following recipients for the purposes stated above:

1. Collinson & Co's related companies, its bank counterparties, banks that are involved in the transaction that you conduct through us.
2. Third party service providers that provides us with electronic verification services of our clients' identity and address information, internal & external audit services, development, maintenance and reporting from our client management databases.
3. The police, certain governmental agencies or other financial institutions, locally or overseas, where we reasonably believe that disclosure will assist the investigation, detection, and/or prevention of money-laundering, fraud or other criminal offences.
4. The government and foreign governments where we believe disclosure is required to comply with regulatory and other requirements.
5. Regulators or government agencies with enforcement powers over Collinson & Co such as FMA, DIA, IRD and Police.
6. Any other party authorised by you.

Some of the recipients referred to above maybe at overseas.

### Use of your personal information for marketing purposes

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As part of our service to you, Collinson & Co may use your personal information to identify products and services that may benefit you. We may send you information from time to time about new or existing products and services. We may disclose your personal information to related companies to enable them to send you information about products or services.

You can let us know at any time if you do not want to receive marketing information from us or our related companies.

### Collinson & Co protects your information

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Collinson & Co protects your personal information from misuse and loss. We protect it from unauthorised access, modification, and unauthorised disclosure by making sure that only authorised people are able to access it. We keep all clients information electronically, we have internal and external IT specialists to maintain computer and network security. They continually maintain and monitor our systems to ensure that online services are secure and that your personal information is protected when you use these services.

If other organisations provide support services to Collinson & Co, we conduct due diligence on their services before we engage them and require them to appropriately safeguard the privacy of the information disclosed to them.

We will not keep the information for any longer than it is needed for the purposes for which it was collected as prescribed by relevant laws and regulations unless there is a good reason for it.

### How you can access or correct your personal information

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You have the right to confirm whether the information is held and to access it. You also have the right to correct your personal information held by Collinson & Co.

If you wish to access your personal information, or if you feel the information that we have about you is inaccurate, incomplete or out-of-date, you can contact us. We will promptly update any personal information that is inaccurate, incomplete or out of date. However, if there is a legal or administrative reason to deny your request, we will tell you the reason why. Where we decide not to make a requested correction and you do not agree, you may ask us to make a note of your requested correction with the information.

### Complaints

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If you have a complaint about the manner in which your personal information was managed or used, please see Collinson & Co Complaints Policy and Procedure to make a complaint.