



PRIVACY PRINCIPLES

This policy sets out how Property Funding collects, uses, manages and stores personal information in accordance with the Privacy Principles contained in the Privacy Act 1993.

1. WHAT IS “CONFIDENTIAL INFORMATION”

- 1.1 **Personal information:** We may collect and hold your personal information:
- 1.1.1 Provided by you, when you either:
 - (a) Apply to be a Borrower and through your lending transaction activities with us;
 - or
 - (b) Apply to be an Investor and through your investing transaction activities with us;
 - 1.1.2 Collected from third parties, such as identity verification and credit reporting service providers.
- 1.2 **Use of personal information:** You agree that we may use your personal information to assist us in conducting our business, including (without limitation):
- 1.2.1 To assess your suitability as either an Investor or Borrower (as applicable);
 - 1.2.2 To deliver information and services to you;
 - 1.2.3 To verify your identification;
 - 1.2.4 To meet our obligations under any contracts we enter into with you;
 - 1.2.5 To conduct credit checks (if you are a Borrower);
 - 1.2.6 Communicating with third party service providers who assist us with functions such as fraud prevention, technology and legal services;
 - 1.2.7 To fulfil our legal and regulatory requirements (including our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009);
 - 1.2.8 For internal research purposes; and
 - 1.2.9 For any other use that you authorise.

We may also use your personal information to promote and market related products and services to you.

- 1.3 **Collection of information:** We will usually collect information directly from you, however we will also collect information from other sources in the circumstances described above, where you have authorised us to do so, or where it is unreasonable or impractical to collect the information directly from you.
- 1.4 **Failure to provide personal information:** You may choose not to provide personal information to us, however this may result in you being unable to become a Borrower or Investor with us.



2. HOW DO WE USE AND DISCLOSE INFORMATION?

- 2.1 **Use of personal information:** We may use the personal information for the above stated purposes set out in clause 1.2.
- 2.2 **Promotional and marketing communications:** In relation to promotional and marketing communications, we will always provide you with a simple means of opting out of receiving such information in the future (for example, by clicking “unsubscribe” in email communications from us), or you can contact us directly.
- 2.3 **Disclosure of personal information:**
- 2.3.1 We may disclose personal information to third parties:
- (a) For the purposes set out in clause 1.2;
 - (b) If we are required or authorised by law to disclose the information;
 - (c) Where it is necessary to facilitate any sale of our business;
 - (d) or promote and market related products and services to you; or
 - (e) If authorised by you.

We will take reasonable steps to ensure that third parties keep any of your personal information that they receive from us confidential.

- 2.3.2 **If you are a Borrower:** we may disclose some of your personal information to our Investors, for the purposes of seeking funding for the loan to you and the ongoing transactions under such loan;
- 2.3.3 **If you are an Investor:** we may disclose your name and contact details to other Investors, for example in Investor communications regarding an investment opportunity, or the performance and repayment of any investment in which there is more than one Investor.
- 2.3.4 We may also disclose your information to related companies as permitted under the Privacy Act 1993.

We do not sell personal information to third parties.

3. RIGHT OF ACCESS AND CORRECTION

- 3.1 **Right of Access:** You can access and request the correction of any of your personal information at any time. You may also request that we delete your personal information, however this may impact on your ability to remain as an Investor or Borrower with us.
- 3.2 **Exceptions:** Your right to access and correct your information is subject to the exceptions contained in the Privacy Act 1993.



4. STORAGE AND SECURITY OF INFORMATION

- 4.1 **Security measures:** We take reasonable measures to protect all personal information and to ensure your information may only be accessed by authorised persons.
- 4.2 **Cookies:** We use technology called cookies when you use our website. A cookie is a piece of information that our web server will send to your machine. The cookie is stored on your hard drive or in memory, but it does not give us information about your computer. We use cookies to learn more about the way you use our website and to help us improve your use of our website and your online experience.

You are able to configure your web browser to accept or reject all cookies, or to notify you when a cookie is sent (please refer to your browser instructions to learn more about this). If you disable the use of cookies on your web browser or remove or reject specific cookies from our website, then you may not be able to use all the services or webpages on our website.

- 4.3 **Deletion of information:** If we no longer need to hold your personal information for the purposes for which it was collected, and no applicable law requires us to retain that information, we will take reasonable steps to securely destroy and dispose of your information.

5. QUESTIONS AND COMPLAINTS

- 5.1 **Privacy Officer:** If you wish to contact us in relation to this Policy, your personal information, or to make a complaint about our compliance with the Privacy Principles, please contact our Privacy Officer, **Jacinda Manconi**:

Email: compliance@propertyfunding.co.nz

Address: 130 St Georges Bay Road, Parnell, Auckland

Phone: [0800 111 080](tel:0800111080)

- 5.2 **Privacy Commissioner:** If you are not happy with our response to your query or complaint, you may contact the Office of the Privacy Commissioner at www.privacy.org.nz.

6. CHANGES TO PRIVACY POLICY

- 6.1 **Policy may be changed:** We may change this Privacy Policy at any time. Any changes will be effective when a notice of change is posted on our website.

7. INTERPRETATION

- 7.1 **Interpretation:** In this Privacy Policy, the following expressions have the meanings set out:
- 7.1.1 **Borrower** means a person who applies for a loan from Property Funding;
- 7.1.2 **Investor** means a person who registers with us as an investor, for the purpose of advancing funds for use in our property lending business.