

# FAIRHAVEN WEALTH'S PRIVACY POLICY

When you deal with Fairhaven Ventures Limited (trading as Fairhaven Wealth), you'll end up sharing personal information with us.

WE UNDERSTAND THAT THIS IS A PRIVILEGE, AND WE ARE DETERMINED TO BE WORTHY OF THE TRUST YOU PLACE IN US.

Fairhaven Wealth complies with the *Privacy Act 2020* (the Act) when dealing with your personal information. (For reference, "personal information" relates to information that is identifiable to you.)

This policy sets out how we collect, use, disclose, and protect personal information. It doesn't limit or exclude any of your rights under the Act. You can find more information on your rights by visiting [the Office of the Privacy Commissioner's website](#).

## Who we collect personal information from

We collect personal information from clients and prospective clients, plus people who sign up to our electronic mailing list(s). Most of the time, we collect information directly from you.

Where relevant we may also collect personal information from publicly available sources, or from third parties where you've authorised us to do so. Where possible we'll collect and verify information with you directly.

## Why we collect personal information

We collect personal information in order to provide the services you engage us to provide, or to help you make an informed decision regarding whether to engage Fairhaven Wealth.

We also collect email addresses and names for the purpose of sending emails related to Sonnie Bailey's blog, NZ Wealth & Risk ([www.wealthandrisk.nz](http://www.wealthandrisk.nz)). Only people who request to be added to the NZ Wealth & Risk mailing list are on this list, and all subscribers have the opportunity to unsubscribe whenever they receive an email.

In some cases we may also be required to collect additional information in order to satisfy our regulatory obligations, including those stemming from the *Financial Markets Conduct Act 2013* and regulations stemming from this legislation (such as the conditions of our financial advice provider (FAP) license).

## Personal information we collect

Information we collect includes your name, contact information (such as email address), and your interactions with us. When you engage Fairhaven Wealth, or we discuss how Fairhaven Wealth might be able to work with you, we will usually ask you a wide range of questions and collect a lot of information about you. This includes financial information, but also includes broader information to help us get a full understanding of your circumstances and objectives.

Fairhaven Wealth does not implement advice, meaning we do not typically deal with third parties on your behalf. (In the rare situation where this is the case, we would request your specific permission to do so.) Because of this, we do not require the same amount of documentation and information that many other advice firms will typically require from you.

Providing some information is optional. However, if you choose not to provide full or accurate information, this might adversely impact the service we provide to you. In some circumstances it may result in us declining to provide a service to you.

## Cookies, and website tracking and measurement

When you visit Fairhaven Wealth's website, and its related websites, we may use technologies such as cookies, which are small pieces of information or data which are stored on your hard drive or memory, and third-party website trackers such as Google Analytics. These help us improve our websites to make them more useful and interesting for you.

## Who we share information with

Besides staff and directors of Fairhaven Wealth, we will share this information with:

- Regulatory bodies, Government agencies, and law enforcement bodies (in any jurisdiction), where Fairhaven Wealth is required to provide this information.

Financial advisers, for example, are required to keep records in a form and manner that ensures the integrity of the information, enabling it to be conveniently inspected and reviewed by the Financial Markets Authority (FMA). Records must be kept for at least 7 years from the later of when the record is made, the financial advice to which it relates is given, or the date any later record is made that refers to or relies upon information in the record. These obligations stem from the *Financial Markets Conduct Act 2013*.

- Third parties where you provide express consent (such as lawyers, accountants, mortgage brokers, insurance advisers, or family members).
- Professional service providers necessary for Fairhaven Wealth to operate effectively. These include external compliance agencies we engage for quality assurance purposes.
- Service providers used by Fairhaven Wealth to provide its services, particularly software and service providers which incorporate cloud storage or backup into their services. Only the information necessary will be stored with these service providers. We only use reputable service providers where data is encrypted, and representatives of that service provider do not have access to Fairhaven Wealth's data (without express permission and supervision).
- Entities that acquire an interest in an interest in Fairhaven Wealth or its assets, or that express a genuine interest in acquiring an interest in order to conduct due diligence. Where this occurs, only necessary data will be provided this information will be provided in an

extremely secure manner. (At this point in time there is no intention whatsoever to sell an interest in Fairhaven Wealth, so this scenario is very unlikely.)

- Our external dispute resolution scheme (the Financial Dispute Resolution Scheme (FDRS)) if you lodge a complaint against us.

We will **not** sell or rent your personal information to any third party.

## **Some of the ways we keep your information safe**

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.

We use complex, unique passwords and two factor authentication with all online service providers where any client information is stored. We only use reputable service providers that use secure data centres located in countries that have regulatory frameworks relating to privacy similar to our own.

Some of your information may be stored in physical form. This is stored securely in our office, which is kept locked, and cannot be accessed by visitors without supervision. Where practicable, we scan and shred all physical documentation.

We take all reasonable steps to protect your personal information. However, we cannot (and do not) accept any risk or responsibility of disclosure of personal information submitted. There is a risk associated with engaging any service provider, and that is as true for Fairhaven Wealth as any other organisation.

## **You can access and correct your personal information**

You can ask for a copy of any personal information we hold about you, and ask for it to be corrected if you think it's wrong.

If you'd like to ask for a copy of your information, or to have it corrected, please contact us:

**Phone:** 03 421 5764 or 021 0269 2213

**Email:** [sonnie@fairhavenwealth.co.nz](mailto:sonnie@fairhavenwealth.co.nz)

**Address:** 145 Clyde Road, Christchurch 8053

There are only a limited range of circumstances where we could refuse your request to access or request personal information. This would be if access would be unlawful, prejudice enforcement action, or be associated with unlawful activity or serious misconduct. We might also deny access if this was required under New Zealand law or an order of a court or tribunal.

## **Changes to this policy**

Fairhaven Wealth may change this policy from time to time. This policy will be updated by uploading a revised version of the policy onto its website and will come into force at that time.