

COMPLIANCE

Donaldson Brown
ADVISORY | RISK | INSURANCE

Our Privacy Statement

At Donaldson Brown, we are committed to protecting your privacy in accordance with the Privacy Act 2020 (Privacy Act), Health Information Privacy Code 2020 (Privacy Code) and the New Zealand Information Privacy Principles (NZIPPs).

We also have further obligations under the Code of Professional Conduct for Financial Advice Services, Code 5 Protect Client Information in relation to Retail Customers.

This Privacy Statement applies to personal and client information ("information") collected by us and explains how we collect, use, disclose and handle it as well as your rights to access and correct your information and how to make a complaint for any breach of the IPP's.

1. What is personal information?

The Privacy Act defines personal information to mean:

"Information about an identifiable individual; and includes information relating to a death that is maintained by the Registrar-General pursuant to the Births, Deaths, Marriages, and Relationships Registration Act 1995, or any former Act (as defined by the Births, Deaths, Marriages, and Relationships Registration Act 1995)"

2. What is sensitive information?

Whilst not specifically defined within the legislation, in our view we consider the following types of information to be more sensitive in nature. Information or opinion about an individual's racial or ethnic origin, political opinions, Membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information or templates, financial information or any information you have advised us that you deem to be sensitive.

3. What kind of Information do we collect and hold?

The kinds of information we collect and hold varies depending on the services our Financial Advisers are providing, but generally can include:

- Your contact information such as full name (first and last), email address, current postal address, delivery address (if different to postal address) and phone numbers;
- Details relating to your employment (if applicable) or your previous employment;
- Your date of birth;
- Insurance information and history;
- Claims information;
- Information which is publicly available;
- Other information specific to our products or services such as your opinions, statements and endorsements collected directly or via surveys and questionnaires, including but not limited to your views on the products and services offered by Donaldson Brown; and

If you are requesting products or services from us, we will collect any relevant payment or billing information, (including but not limited to bank account details, direct debit, credit card details, billing address, premium funding and instalment information.

The type of sensitive information we may collect generally includes:

- Criminal record;
- Health information;
- Financial information;
- and membership of a professional or trade association.

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4. How do we collect and hold information?

Collection can take place in person or by telephone, email, or in writing and through websites (from data you input directly or through cookies and other web analytic tools).

Unless it is unreasonable or impracticable for us to do so, we will collect your information directly from you or your agents.

We may obtain information indirectly in some circumstances. We will usually obtain it from another insured if they arrange a policy which also covers you, related bodies corporate, referrals, your current or previous insurers or insurance broker/adviser, witnesses in relation to claims, health care providers, publicly available sources, premium funders, and persons who we enter into business alliances with.

If you provide us with information about another person you must only do so with their consent and agree to make them aware of this privacy notice.

We attempt to limit the collection and use of more sensitive information from you unless we are required to do so to carry out the services provided to you. However, we do not collect more information without your consent.

We hold the information we collect within our own data storage devices or with a third-party provider of data storage. We discuss the security of your information below.

5. The purpose for which we use your information

We collect, hold, use, disclose and share your information where it is reasonably needed for, or directly related to, undertake our work. This includes:

- Providing insurance broking services and intermediary services,
- funding and claims management services,
- risk management and other consulting services,
- meeting our legal obligations.

For example, we usually need to collect, hold, use and disclose information to:

- Identify you and conduct necessary checks (including where required by the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and other legislation).
- Decide what products or services we can offer you(e.g., insurance broking, financial advice, funding, claims management, risk management and other consulting).
- Provide, manage, and administer the services and products you obtain, including investigating, handling, and settlement of claims.
- Improve our services and products (e.g., staff training, product and service research, data analysis and business planning; and
- Tell you about our products, services, events including offers from third parties we think may be of interest to you and to conduct market or customer satisfaction research.
- Direct marketing (further information on this is supplied below).

We do not use or disclose information for any purpose that is unrelated to our services and that you would not reasonably expect (except with your consent). We will only use your information for the primary purposes for which it was collected or as consented to.

6. Shared information

We share your information with third parties as required by law or who are involved in the provision of our services.

We only share your information:

- When it's needed for the services we provide, or
- With your consent.

These parties collect and hold your information that we provide. They use that information to assess insurance needs, provide quotes, issue policies, manage claims, and manage payments. They follow their own privacy policies when doing this. Copies of these may be provided on request.

Examples of the organisations we might share information with are:

- our related companies, agents or contractors,
- insurers, their agents, reinsurers and others they rely on to provide their services and products,
- regulators such as FMA,
- premium funders,
- other insurance brokers/advisers, insurance reference bureaus, loss adjusters or assessors, medical service providers,
- Lawyers, accountants, credit agencies or potential buyers of our business, and
- other business partners.

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These organisations must only use your information for the specific purpose which we gave it to them.We take reasonable steps to ensure that they know and follow our Privacy Statement in relation to your information.

7. Consent

If we do propose to disclose or use your information other than for the purposes listed above, we will seek your consent before using or disclosing.

8. What if you do not provide information to us?

We will tell you what the likely consequences are at the time of request but if you do not give us the information we ask for, we or the third parties may not be able to offer or deliver the right products or services (for example, we may not be able to provide you with quotes, issue a policy or handle a claim).

9. What do we expect of you/third parties we deal with when providing information about another person?

When you give us information about another person, we expect you to:

- Have told that person you might share their information with us and explained how we will handle it.
- Get their consent first if the information is sensitive (for example health information).
- If you haven't told them or got consent, tell us before you give us the information.

If we give you information, you must only use it for the purposes we agreed on.

Unless an exemption applies or we agree otherwise, you must follow the Privacy Act, when collecting, using, disclosing and handling information on our behalf.

You must also ensure that your agents, employees and contractors follow these same rules.

10. AI Tools

We use approved, business-grade AI tools to help our people draft, summarise, analyse and administer our work, including transcribing meetings where everyone present has been told.

AI supports our people. It does not make decisions about you, and a qualified person reviews anything that affects your advice. We do not use AI to profile clients, and we do not put your information into free or public AI tools.

Our approved tools may process information outside New Zealand: Our providers do not use your information to train their models. You can ask us about our use of AI at any time at privacy@dbib.co.nz.

11. How do we manage the security of your information?

We take reasonable steps to ensure that your information is safe. We store information mainly electronically and sometimes on paper, either with us or with our approved storage providers.

We work to prevent misuse, interference, loss, or unauthorised access, modification or disclosure.

When we dispose of information, we destroy it or permanently de-identify it in line with the Privacy Act.

We use technical protections such as firewalls, anti-virus & anti-spam software, and access controls like user ID's, MFA technologies and passwords which are managed and monitored by our IT specialists.

In relation to Third Party tools, security is managed by those third parties but we have single sign in internal access controls, security alerts and follow a strict due diligence process before we utilise any third party tools.

We cannot guarantee the security of all online transmissions of information, especially where the internet is involved.

12. Data Quality

We take reasonable steps to keep your information accurate, up- to-date and complete when we collect, use or share it.

What we do:

- Check and confirm the details we hold about you during our dealings with you.
- Ask you if any information needs updating.

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What we need from you:

- Tell us if you find any errors in your information.
- Let us know about any changes (for example, a new name or address).

13. Access to and correction of your information

Under the Privacy Act 2020, you have the right to access and correct your Personal Information.

In accordance with those obligations Donaldson Brown will:

- Give you the opportunity to access the Personal Information, we hold about you, and correct any errors generally without restriction.
- Provide our Internal Complaints Process to you, should you wish to complain about how Donaldson Brown handle your Personal Information.

Our goal is to have accurate and up-to-date information.

When you receive policy schedules, renewal notices or other documents from us, you should contact your Financial Adviser if you consider the information is not correct.

Where possible and appropriate, we will correct the information on Donaldson Brown's systems or held on file or note your request to correct the information on our systems or files.

For security reasons, any request for details of Information held by Donaldson Brown must be made in writing.

14. Do we transfer information overseas?

Sometimes we send your information outside New Zealand, including but not limited to Australia, United Kingdom and the United States of America.

Details of the countries we disclose to may change from time to time. Information may also be processed by staff or by other third parties operating outside New Zealand who work for us or for one of our suppliers, agents, partners or related companies.

In some cases we cannot guarantee that overseas providers follow the Privacy Act or have the same protections or obligations as in New Zealand.

By using our services and products you agree that (where the law allows) you may not be able to make a claim under the Privacy Act or against us for how your information is handled overseas, and you may not be able to seek remedies in the other country.

If you do not agree to your information being sent outside New Zealand, please contact us and tell us.

If we need to send your information to a provider in a country without similar privacy laws, we will tell you and get your clear, written consent before we transfer it.

15. Sale or restructure of business

If we consider the sale or restructure of our business or the purchase of other Insurance Brokers or financial advisers it may be necessary for your information to be disclosed to permit the parties to assess the sale or restructure proposal for example through a due diligence process.

We will only disclose information that is necessary for the assessment of any sale or restructure proposal and subject to appropriate procedures to maintain the confidentiality and security of your information. In the event that a sale or restructure proceeds, we will advise you accordingly.

16. Direct Marketing

We may use your information, including any email address, to tell you about our products, services, events or third party offers and events which we consider may be of interest to you.

We may ask our related parties to contact you about their services or products.

You have the right to opt-in and opt-out of receiving direct marketing communications. Please contact your Financial Adviser if you would like to change your marketing preferences or want more information.

We do not use your sensitive (as defined in 3.0 above) information to send you direct marketing communications without your express consent.

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17. Our Website

You can visit our website without providing any information. We will only collect information through our websites with your prior knowledge for example where you submit an enquiry, application or interact with PIP online. Email addresses are only collected if you send us a message and will not be automatically added to a mailing list.

18. Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use may identify individual users.

- Cookies can either be "persistent" or "session" based.
- Persistent cookies are stored on your computer, contain an expiration date, and are mainly for the user's convenience.
- Session cookies are short-lived and are held on your browser's memory only for the duration of your session; they are used only during a browsing session and expire when you quit your browser.
- We may use both session and persistent cookies. This information may be used to personalise your current visit to our websites or assist with analytical information on site visits.

Most internet browsers can be set to accept or reject cookies. If you do not want to accept cookies, you can adjust your internet browser to reject cookies or to notify you when they are being used. However, rejecting cookies may limit the functionality of our chatbot.

19. Complaints

If you do have a privacy complaint please contact our office first so we can help you quickly.

To resolve your complaint, we will:

- Work with you to understand the problem and what caused it.
- Ask you to put the complaint in writing if needed.
- Tell you how long we expect to take to respond.
- Explain our decision and the reasons for it.
- Keep a record of the complaint and any action we take in our Register of Complaints.

If you have a complaint, please contact your Financial Adviser or email or write to us at and our Privacy Officer will then attempt to resolve the issue or complaint. We recommend that you retain this information for future reference.

20. How to contact us and opt out rights

If you:

- wish to gain access to your personal information,
- want us to correct or update your information,
- have a complaint about a breach of your privacy,
- wish to withhold your consent (opt out) to any of the uses of your information including receiving offers of products or services from us, or
- have any other query relating to our Privacy Statement, contact your Financial Adviser or our Privacy Officer during business hours on:



+64 09 215 3371
privacy@dbib.co.nz



Attn: Privacy Officer
Donaldson Brown
PO Box 37068
Auckland 1151

We welcome your questions and comments about privacy.

This Privacy Statement is current from **5 October 2026**. If this Privacy Statement or any part thereof is amended or modified in the future, the revised version will be available by contacting our office or on our website.

You can also obtain information on privacy issues in New Zealand on the Privacy Commissioner website at **www.privacy.org.nz** or by contacting them by email at enquiries@privacy.org.nz or by calling on +64 4 474 7590.