



**Citadel
Insurance**

**Insure
Protect
Prosper**

Privacy Notice

At Citadel 2024 Ltd and Citadel BOP Ltd (together trading as Citadel Insurance), we are committed to protecting your privacy in accordance with the Privacy Act 2020 (Privacy Act) and the New Zealand Information Privacy Principles (NZIPPs). This Privacy Notice outlines how we collect, disclose and handle your personal information as defined in the Act.

Why do we collect your personal information?

We collect your personal information so we can:

- identify you and conduct necessary checks (including where required by the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and other legislation);
- determine what services or products we can provide to you such as our insurance broking services, financial advice services, funding services, claims management services, risk management and other services;
- issue, manage and administer services and products provided to you or others, including claims investigation, handling and settlement;
- improve our services and products. For example, training and development of our representatives, product and service research and data analysis and business strategy development; and
- provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services and events which we consider may be of interest to you).

What if you do not provide some personal information to us?

If the required personal information is not provided, we or any involved third parties may not be able to provide appropriate services or products. If you do not provide the required personal information, we will explain what the impact will be.

How do we collect your personal information?

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

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

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

Who do we disclose your personal information to?

We share your personal information with third parties for the collection purposes noted above where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

We do not use or disclose personal 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 personal information for the purposes for which it was collected or as consented to.

We may disclose personal information to third parties who assist us or are involved in the provision of our services, and your personal information is disclosed to them only in connection with the services we provide to you or with your consent. We may also disclose it for direct marketing purposes.

These third parties can include:

- Insurance Advisernet NZ (IANZ), our network provider, who provides CRM, compliance and technology services and may access personal information in connection with those services;
- our related companies, agents or contractors;
- insurers, their agents, and others they rely on to provide their services and products (for example reinsurers);
- premium funders;
- regulators such as the Financial Markets Authority (FMA);
- other insurance brokers or advisers;
- loss adjusters or assessors;
- medical service providers;
- credit agencies;
- lawyers and accountants;
- prospective purchasers of our business; and
- our alliance and other business partners.

These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them, and we take such steps as are reasonable to ensure that they are aware of the provisions of our Privacy Notice in relation to your personal information.

We also use personal information to develop, identify and offer products and services that may interest you, and to conduct market or customer satisfaction research.

From time to time, we may seek to develop arrangements with other organisations that may be of benefit to you in relation to the promotion, administration and use of our respective products and services.

Any personal information provided to us may be transferred to, and stored at, a destination outside New Zealand, including but not limited to Australia, the United Kingdom and the United States of America. If we need to provide your personal information to a country that does not offer similar privacy protections, we will fully inform you and seek your express consent to do so, prior to sharing your personal information.



Sharing your information with insurers and premium funders

When we arrange insurance on your behalf, or refer you to a premium funder, your personal information is provided to and independently held by the relevant insurer or premium funder. This is required in order to issue and manage your policy or funding arrangement. Those parties hold and process your personal information in accordance with their own privacy policies, which are separate from this notice.

In accordance with IPP3A of the Privacy Act 2020, we want you to know that you have the right to:

- Ask us to identify which insurer or premium funder holds your personal information in connection with any specific policy or arrangement we have placed on your behalf.
- Contact that insurer or premium funder directly to access or request correction of the personal information they hold about you, or to raise a privacy concern with them.
- Access the privacy policy of any insurer or premium funder we work with. To find out which insurers or premium funders are relevant to your policies, or to obtain links to their privacy policies, please contact us at

How long do we hold your personal information?

We retain personal information for as long as it is needed to fulfil the purposes for which it was collected, or as required by law. Financial advice records are held for a minimum of 7 years in accordance with the Financial Markets Conduct Act 2013. Other personal information is held for as long as reasonably necessary and then securely destroyed or de-identified.

More information, access, correction or complaints

You have the right to request access to, and correction of, the personal information we hold about you. We will respond to any such request within 20 working days, as required by the Privacy Act 2020.

For more information about our privacy practices, including how we collect, use or disclose information, how to access or seek correction of your information, or how to complain about a breach of the New Zealand Information Privacy Principles, please contact our Operations Manager at

If you are not satisfied with our response to a privacy concern, you may also complain to the Office of the Privacy Commissioner at

Your consent, contacting us and opting out

By providing us with personal information, you and any other person you provide personal information for, consent to this use and these disclosures unless you tell us otherwise.

If you wish to withdraw your consent, including for things such as receiving information on products and offers by us or persons we have an association with, please contact us

Citadel Insurance

FSP1007340 and FSP1011157

Ground Level/33 Totara St

Mount Maunganui 3116

