

The Concierge PRIVACY POLICY

1. Totalalink Limited (“**The Concierge**”, “**we**”, “**us**”, “**our**”) is committed to complying with the New Zealand Privacy Act 2020 (the “**Act**”) when dealing with personal information. Personal information is information about an identifiable individual (a natural person).
2. The collection of your personal information and/or your client’s personal information is essential to enable us to conduct our business of offering and providing you with our range of products and services, including the use of our Concierge and associated website (if any), apps (if any) and services (“**Services**”). This information may be confidential or sensitive, and it is important you know how we treat this information. Please read this Privacy Policy as well as the applicable service terms and conditions, to understand how we collect, store, use, process and disclose your personal information.
3. By providing us with your personal information, you agree to the collection, storage, use and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree, you may not be able to use the Services.

What information does The Concierge collect?

4. We collect your personal information for lawful purposes connected to our functions and activities (including for the purposes of providing the Services to you), for purposes directly related to this or where you have agreed we may do so.

The information we collect can include:

- (a) Information you provide when using our Services. This includes information such as your name, email address, address and mobile phone number, provided at the time of registering or utilising any of our Services. We may also collect your personal information from a third party or other sources where you have authorised us to do so, or where it is otherwise consistent with the Act.
- (b) If you contact us via phone, we may receive additional information about you. For example, we will receive your name, email address, phone number and, we may keep a copy of the correspondence.
- (c) Details of transactions you carry out with our team or using our technology including the fulfilment of these transactions.
- (d) Any other information that you voluntarily provide to us.

IP Addresses

5. We may collect information about your computer, including, where available, your IP address, operating system, website activity and browser type, for system administration and to report aggregate information for our advertisers. This is statistical data about our users’ browsing patterns and actions, and does not identify any individual

How does The Concierge use your information?

6. We use your personal information only for purposes you have agreed to, for purposes related to the provision of our Services or where we are authorised, or required to under the Act or any other law.
7. For example, we may use your information:
 - (a) to establish your requirements and provide the appropriate Services;
 - (b) to set up, administer and manage our Services;
 - (c) to understand your needs and improve our Services, including training and developing our staff and representatives;
 - (d) to verify your identity;
 - (e) to communicate with you;
 - (f) to protect our rights;

- (g) to ensure the secure and proper operation of our Services;
 - (h) for internal research purposes;
 - (i) for any other use you authorise;
 - (j) for the security of our staff and clients; and
 - (k) in any other way set out in this Privacy Policy.
8. We may be required by the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 to collect your personal information to verify your identity. Therefore, the collection of certain personal information will be mandatory for particular Services you require.
9. We may de-identify and aggregate data collected through the Services and use it for any purpose. It is important to remember that such information does not identify you individually.

Sharing your information

10. We may disclose your personal information where you have authorised such disclosure, where disclosure is directly related to the purpose of collection or where we are required or permitted to under the Act.
11. We may disclose your personal information to:
- (a) Third party service providers and/or customers in order to provide the Services to you (including Referral Partners, as defined in our service terms and conditions).
 - (b) Subsidiaries, related companies or joint venture companies where required or authorised under our relationship.
 - (c) Information technology providers, including hardware and software vendors and consultants such as programmers, for the development or delivery of our Services only.
 - (d) Intermediaries such as your adviser, broker, a representative acting on your behalf with your consent, or our authorised representatives and our agents.
 - (e) Accounting and financial specialists, trustees associated with superannuation funds, government, law enforcement or statutory bodies, professional advisers, administration or business management services.
 - (f) Printers and mail service and delivery providers for the mailing of statements in connection with the provision of the Services, and marketing material in accordance with the terms of this Privacy Policy.
 - (g) Imaging and document management services.

Disclosure overseas

12. We will only store and process your personal information in New Zealand and overseas. Where we store information outside of New Zealand (whether by us or a third-party service provider that we use to provide the Services), we will ensure that the storage and processing complies with New Zealand privacy obligations.
13. Our third-party service providers may also do so where you receive services directly from them. It is the responsibility of our third-party service providers to collect appropriate consents from you in order to send your personal information overseas. You should check the privacy policies of any such third-party service providers to ensure that you are comfortable with their terms.

Access to, correction, modification and deletion of your information

14. We take reasonable steps to ensure that the personal information we hold about you is accurate.
15. You have the right at any stage to request us to provide you with access to your personal information. We will respond to any request by you to correct or access your personal information as soon as practicable following receipt of such request, but there are exceptions under the Act where we may not be able to do so. We will tell you if that is the case.
16. If you have any questions or requests for your information, please contact **Jonathan at jonny@theconcierge.co.nz**

Personal Information Storage

17. We will retain your personal information for no longer than is required for the purpose for which the information was initially collected and where necessary to comply with our legal obligations.
18. We take reasonable steps to ensure that your personal information is protected against loss, unauthorised access, use, disclosure, alteration or destruction. We adopt policies and procedures to protect your personal information, and we review these regularly.

Marketing

19. You consent to us sending you information connected with the above collection and use purposes via email or text message when you provide us with your email address and/or mobile phone number.
20. We may also send you other information we think you may be interested in and which may market and promote the Services, or the products and services of our subsidiaries, related or joint venture companies. The messages you receive from us will have instructions for how you can remove yourself from our mailing list.
21. Electronic marketing will only be sent to your email address or mobile phone number if you have given your consent. You may unsubscribe to any email marketing message at any time by following the unsubscribe instructions contained in the message

General

22. This Privacy Policy is governed by New Zealand law and the New Zealand courts have exclusive jurisdiction.
23. Changes in legislation, industry codes, the business environment, or the addition of new products and services to this site may result in changes to this Privacy Policy. If we make any changes, then we will tell you about them by posting an updated policy via the Tool. We encourage you to look at this Privacy Policy on a regular basis to stay informed of any changes. By continuing to use our Services or provide information to us, you agree to any changes made to this Privacy Policy.

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