

Privacy Policy

1 Introduction

- 1.1 Greenwood Roche is committed to protecting your personal information and complying with the Privacy Act 2020. *Personal Information* is any information about an identifiable individual, such as identity information (e.g. name, date of birth, address etc.), contact information, correspondence, documents, and information about finances or employment.
- 1.2 This privacy policy sets out how we may collect, use, store and disclose your Personal Information, the rights you have in relation to it, and how we work to protect your privacy.
- 1.3 We collect information from you when you engage us to act for you (if you are the client) or if you are an employee or representative of our client, when you visit our website, or when you apply for a role with us.
- 1.4 We may update this policy from time to time. Any changes take effect once the updated policy is published on our website.
- 1.5 This policy should be read together with our terms of engagement, which is on our website.

2 How we collect Personal Information

- 2.1 We may collect Personal Information in a number of ways, including:
 - when we interact with you directly;
 - when we carry out conflict checks or customer (client) due diligence, including by using third-party data suppliers and providers to verify your identity for the purpose of complying with our anti-money laundering obligations;
 - from third parties involved in the matter for which you engaged us;
 - when you use our website;
 - when you apply to work at Greenwood Roche; or
 - from publicly available sources.
- 2.2 Where practicable, we will endeavour to collect Personal Information directly from you. We may also ask for your written consent to collect, store and disclose your Personal Information.
- 2.3 Our website uses "cookies" to support site functionality and to analyse site usage. You can adjust your browser settings to refuse or limit cookies if you prefer.

3 How we use your Personal Information

3.1 Some of the ways we may use Personal Information are:

- in the course of representing or advising you;
- for internal business purposes such as preparing invoices;
- for purposes you specifically authorise, including publishing information on our website;
- for dealing with any legal, commercial or ethical conflicts;
- sending you invitations, updates or publications; and
- to comply with our legal and professional obligations.

3.2 We may disclose or may be required to disclose Personal Information to third parties in certain circumstances, both within and outside New Zealand, including:

- to carry out your instructions;
- to carry out work for you relating to the matter for which you engaged us;
- to carry out customer (client) due diligence;
- as required by law; or
- if we are required or permitted to do so by the New Zealand Law Society's Rules of Conduct and Client Care for Lawyers.

3.3 If we transfer your Personal Information outside New Zealand, and, if relevant, the European Commission has not provided an adequacy decision in relation to the recipient, we will take reasonable steps to ensure that the recipient is subject to comparable safeguards to those in the Privacy Act, or we will obtain your express consent to the transfer.

4 How we store your Personal Information

4.1 We may store your Personal Information in hard copy or electronic form, including using third party data storage operators or in online storage located within or outside New Zealand. By providing us with your Personal Information, you consent to us storing this information outside of New Zealand and in third party facilities.

4.2 We will take reasonable steps to protect your Personal Information we hold from misuse, loss and unauthorised access, modification or disclosure.

4.3 We will retain your Personal Information for as long as we have a relationship with you and for a period after this that we must do so for legal or business reasons – for example, to comply with anti-money laundering or audit obligations. After that period, we will comply with our legal obligations in relation to your Personal Information, which will generally mean deleting that information.

5 **What your rights are in respect of Personal Information we may hold about you**

- 5.1 The Privacy Act 2020 sets out your rights in respect of any Personal Information we hold about you.
- 5.2 Visit <https://www.privacy.org.nz/your-rights/your-privacy-rights/> for further information.
- 5.3 You may contact us to review and/or request correction of your Personal Information.
- 5.4 You may have additional rights if you are a person to whom the European Union General Data Protection Regulation (EU2016/679) (GDPR) applies. If the GDPR applies, you may also have the right to:
- revoke your consent to process your Personal Information;
 - access and/or request a portable copy of your Personal Information;
 - request restrictions upon the processing of, rectification or erasure of your Personal Information in certain circumstances; and
 - make a complaint to a supervisory authority.
- 5.5 If you would like to contact us in respect of your Personal Information, please email us at mail@greenwoodroche.com.

6 **Third-party websites**

- 6.1 Our website may include links to third-party websites. When you click on one of these links, you will be subject to that third-party's privacy policies. We are not responsible for the actions of any third-party websites, or for how that third-party may collect, store, use or disclose any Personal Information that you may provide.

7 **Protecting your privacy**

- 7.1 We will treat your Personal Information as strictly confidential and we will only use it for the purposes for which it was collected, subject to any allowable disclosures. Some of the ways we protect your Personal Information include:
- maintaining access-restricted premises;
 - storing information in secure off-site or electronic data storage facilities or systems; and
 - providing Privacy Act training to our staff.