

Invicta Financial - Privacy Policy

At Invicta Financial, we take your privacy seriously. As a business that collects and holds personal information about our clients, we are committed to complying with Code Standard 5 of the Code of Professional Conduct for Financial Advice Services and the Privacy Act 2020. We recognise the importance of protecting your personal information and are dedicated to ensuring that it is collected, used, stored, and shared responsibly.

We only collect personal information that is necessary for the services we provide, and we take all reasonable steps to keep your information secure. This policy outlines how we handle your personal information, your rights, and our responsibilities.

What is Personal Information?

Personal information is any information that relates to a living, identifiable human being. This includes:

- Your name, contact details, and date of birth
- Financial information, including income, assets, and liabilities
- Insurance or investment records
- Health information provided for life and health insurance purposes

It does not need to be secret or sensitive to be considered personal information. Essentially, if the information could identify you as an individual, it falls under the Privacy Act 2020.

For more information, the Privacy Commissioner provides guidance here: [Privacy Commission – Personal Information](#).

How We Collect Personal Information

We collect personal information directly from you when you:

- Meet with one of our advisers
- Complete application forms or consent forms for financial advice, insurance, KiwiSaver, or other investment products
- Communicate with us via email, phone, or online forms

- Provide information to enable claims, underwriting, or other administrative processes

We may also collect information from third parties with your consent, such as:

- Financial institutions or product providers
- Other service providers where relevant to providing advice or services to you

We only collect information that is necessary for providing financial advice, assessing suitability of products, managing claims, or meeting regulatory obligations.

Anti-Money Laundering and Identity Verification

To provide investment planning services, we must meet obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009. This may include collecting and verifying:

- Identity documents (e.g., passport, driver licence)
- Proof of address
- Source of funds or source of wealth
- Information required for ongoing customer due diligence

We may use third-party identity verification providers to complete this process securely.

Client Authorisation and Consent

When we first meet a client, we explain the services we offer and provide a Personal Information Authority & Declaration. This document confirms that you:

- Understand the purpose of collecting your information
- Authorise us to use your information for providing financial advice or related services
- Permit us to obtain relevant information from third parties when necessary (e.g., providers for underwriting or claims)
- Consent to receive electronic marketing (where applicable), with the option to unsubscribe at any time

- Authorise limited sharing of information with third parties for quality assurance, complaint management, or regulatory compliance purposes

You have the right to access, review, and correct any personal information we hold about you at any time. We do not provide personal information to third parties without your explicit consent, except where required by law.

How We Keep Your Information Secure

Office Security

- Offices are locked when unattended
- Physical files are only used when necessary; most information is stored digitally in our secure systems
- Computers and devices are password-protected and accessible only to authorised staff
- Emails and information are only sent once we have verified the identity of the recipient

Data Security

- We use a custom-built Customer Relationship Management (CRM) system, developed and maintained by Invicta Financial, to securely store client information
- Access to the CRM is restricted to authorised staff with unique logins and strong password requirements
- Users are automatically logged out after periods of inactivity, and only one active session is allowed per user at a time
- If a laptop or device is lost or unaccounted for, passwords and access controls are updated immediately to prevent unauthorised access
- We only use trusted third-party service providers that comply with the Privacy Act 2020 and contractual obligations to maintain security
- All electronic communications and online systems use secure networks and encryption where applicable

We take all reasonable steps to ensure both physical and electronic information is secure from unauthorised access, loss, or disclosure.

Overseas Cloud Storage

Some client information may be stored or processed using secure cloud services located outside New Zealand. Where this occurs, we ensure that these providers comply with the

Privacy Act 2020 and provide comparable safeguards to protect your information. You authorise us to store information using these services.

How We Use Your Information

Your personal information is only used for the purposes you have authorised. This may include:

- Assessing the suitability of financial products, insurance, or investment options for your needs
- Implementing and managing investment portfolios using external platform, custodian, or product providers, including disclosure of relevant personal information required for account establishment and ongoing servicing
- Preparing and submitting applications for insurance or KiwiSaver products
- Managing claims and underwriting requests with providers
- Meeting regulatory and compliance obligations
- Quality assurance and internal reviews of our services
- Communicating with you about products, services, or advice you have requested
- Sending electronic marketing only if you have given consent, with the option to unsubscribe at any time

Once your personal information is no longer required, or at your request, it will be returned to you or securely destroyed. We retain advice and service records for a minimum of 7 years, or longer if required to meet our legal, regulatory, or dispute resolution obligations.

Breach of Privacy

If a privacy breach is suspected or identified, we:

1. Review the breach to determine potential harm
2. Take immediate action to prevent further breaches
3. Notify affected clients about the breach, what information may have been involved, and steps we are taking to limit any impact
4. Report the breach to the Privacy Commissioner using the NotifyUs function: [Privacy Breach Notification](#)
5. Record the breach in our Incident & Breach Register and address it according to our Material Issues and Reporting Policy

We aim to resolve breaches promptly and transparently, prioritising the protection of client information.

Recording of Meetings

With your consent, we may record phone calls or online meetings for training, monitoring, and compliance purposes. If you do not wish to be recorded, please tell us and we will disable recording.

Disclosure to Regulators and Dispute Resolution Schemes

We may share your personal information where required to meet our legal or regulatory obligations. This may include providing information to:

- The Financial Markets Authority
- Our dispute resolution scheme
- Supervisory bodies, auditors, and compliance consultants
- Other parties where required by law, including under the Privacy Act 2020 or court order

Any disclosure will be limited to what is necessary and lawful.

How Compliance is Monitored

Invicta Financial regularly reviews all advice files, processes, and systems to ensure compliance with the Privacy Act 2020. Staff are trained in handling personal information appropriately, and any questions or concerns about privacy practices can be directed to our team at info@invictafinancial.co.nz.

Contact Information

If you have any questions about your personal information, our practices, or this privacy policy, you can contact us at:

Email: info@invictafinancial.co.nz

Phone: 0800 INVCTA (0800 468 282)

Christchurch Office: Second Floor, 45 Mandeville Street, Riccarton, Christchurch 8011

Auckland Office: 1/123 Broadway, Newmarket, Auckland 1023

