

PRIVACY POLICY

Sunny Financial Services Limited (NZBN 9429052826078) (**SFS, we, us or our**) owns and operates a private wealth advisory business providing investment advice, bespoke portfolio construction and asset allocation, investment management and wealth-management solutions, performance reporting, ongoing advisory and succession planning and related client services (our **services**), delivered through our website and digital tools and in coordination with custodians, investment platforms and clients' authorised representatives.

We are committed to protecting and maintaining the privacy, accuracy and security of personal information collected, used, stored and disclosed in connection with our services. We understand the importance of privacy to our clients (**you or your**) as a private wealth adviser.

This privacy policy sets out details of how we collect, use, store and disclose personal information.

1. DEFINED TERMS

1.1 In this privacy policy:

personal information has the meaning given to it in the Privacy Act 2020 but, generally, means information about an identifiable living individual; and

authorised representative means any person or organisation that you have authorised to act on your behalf, including accountants, lawyers, trustees and other professional service providers.

2. CONSENT

2.1 By registering for, accessing or using our services, you consent to our collection, use, storage and disclosure of your personal information, as applicable, in accordance with this policy.

3. WHAT PERSONAL INFORMATION WE COLLECT

3.1 We will only collect personal information necessary for a lawful purpose in connection with the provision of our services.

3.2 The personal information we collect will generally include the following:

- (a) contact information such as your name, address, email address and telephone numbers;
- (b) personal identification information including your date of birth and any identity verification documents such as passport or drivers' licence information;
- (c) financial information about your personal and financial circumstances to enable us to assess your needs and provide suitable services;
- (d) interaction information such as meeting notes, correspondence, instructions and any call recordings (if applicable); and
- (e) website and analytics data including IP address, browser type and site usage patterns.

You may choose to not provide us with your personal information, but not doing so may affect our ability to provide you with our services.

4. HOW AND WHERE WE COLLECT YOUR PERSONAL INFORMATION

4.1 We will collect your personal information directly from you when you:

- (a) meet with us, provide information through forms, or make digital submissions; or
- (b) use or access our services; or
- (c) communicate or interact with us, whether by email, telephone, social media or otherwise.

You are required to keep us informed of changes to your personal information to enable us to have proper administrative processes.

- 4.2 We may also collect your personal information directly from your authorised representatives (such as your accountants, lawyers, trustees and other professional service providers) acting on your behalf.
- 4.3 We may also collect your personal information indirectly, for example:
- (a) from you through emails, face-to-face meetings or telephone conversations where the information arises incidentally during those interactions;
 - (b) from third party providers such as custodians, fund managers, investment platforms, banks, insurers or other financial institutions engaged in delivering services to you;
 - (c) from publicly available sources (such as through official public records or regulatory filings), where lawful and appropriate; and
 - (d) via our website, through cookies, analytics tools and other tracking technologies used to improve functionality and security.

5. NON- PERSONAL, ANONYMISED AND AGGREGATED INFORMATION

- 5.1 We may also collect non-personal, anonymised and aggregated information, including information generated by our website or the provision of our services, which tracks your use of our website or our services, but which does not identify you personally.
- 5.2 We may use this information to analyse service patterns, optimise platform features, assess usage trends and operational performance and to provide you with related reports.

6. COOKIES

- 6.1 Our website uses server logs and web analytic tools (such as “cookies”). Cookies are small text files that are downloaded to your device by websites that you visit. When you use our website, these tools collect information such as the browser and operating system that you use, the internet protocol address of the device you use to access the site, search terms, your location and the content that you view when visiting the website. We use cookies to enable secure sessions, analyse system performance and improve usability.
- 6.2 You can set your browser to block all cookies, including cookies associated with our website, or to indicate when a cookie is being set by us. However, if you set your browser to reject cookies some features of our platform or our services may become unavailable.

7. HOW WE USE YOUR PERSONAL INFORMATION

- 7.1 We may use your personal information to provide our services to you.
- 7.2 We may also use your personal information to:
- (a) identify you and verify your identity;
 - (b) communicate with you (including to market our services) and manage our relationship;
 - (c) administer your account, including invoicing and payment of fees;
 - (d) improve our services, maintain internal training, and support business planning and operational needs;
 - (e) enforce our terms and any agreements we have with you;
 - (f) comply with our legal and regulatory obligations, including AML/CFT, tax reporting, and any immigration or investment-related requirements; and

(g) for any related purpose in connection with the above.

7.3 We may use any information that we collect from you that is not personal information (so you cannot be personally identified from it) for our business purposes, including:

- (a) to assess how our clients or potential clients use our services;
- (b) to improve our services; and
- (c) for marketing and promotional purposes.

8. ADDITIONAL REQUIREMENTS FOR YOUR PERSONAL INFORMATION

8.1 You may request that we take additional measures in relation to your personal information from time to time by emailing us at compliance@sfspw.co.nz or writing to us at Level 13, 29 Customs Street West, Auckland Central, Auckland 1010.

8.2 For example, you may request that we do not disclose your personal information in certain circumstances, where additional confidentiality is required, including where your financial arrangements, investment positions or personal circumstances are particularly sensitive. If we agree to your request, you are required to keep us informed about any changes to such requirements.

9. MARKETING

9.1 We may use your personal information to offer you services that we believe meet, or may meet, your needs. You can notify us at any time if you would like us to change your contact details or if you do not wish to receive these offers by emailing us at compliance@sfspw.co.nz or writing to us at Level 13, 29 Customs Street West, Auckland Central, Auckland 1010. We will act promptly on any such request.

10. WHO WE MAY DISCLOSE YOUR PERSONAL INFORMATION TO

10.1 We may disclose information we retain about you, including your personal information, to the following:

- (a) a related company within the SFS Private Wealth group;
- (b) agents or third parties that provide services to or for us, including auditors, law firms and other professional advisers who have agreed to only collect, hold, use and share your personal information for the purposes for which it has been given to them;
- (c) custodians, investment platforms, fund managers and administrators;
- (d) banks, agents, registrars, contractors or other entities assisting with transactions;
- (e) a portfolio company, or its agents, contractors, officers or employees, for the purpose of complying with any relevant law or to enable us to meet our obligations to you or to the portfolio company under this or any other agreement;
- (f) regulators, Government authorities or departments, or law enforcement agencies (including the Police);
- (g) liquidators, administrators or other persons appointed to administer your financial affairs;
- (h) debt collection services or credit reporting agencies;
- (i) any person or organisation authorised by you; and
- (j) any agents or subcontractors of any of the persons listed above.

If any of the persons listed above are foreign persons or entities, we will only disclose your personal information to them in accordance with the Privacy Act 2020, for example where we

believe on reasonable grounds that the recipient is subject to privacy laws that, overall, provide comparable safeguards to those contained in the Privacy Act 2020. Otherwise, we will obtain your express consent to transfer or store the personal information outside New Zealand.

11. YOUR PERSONAL INFORMATION IS SECURE

11.1 In line with the Privacy Act 2020, we will take reasonable steps to keep your personal information secure and confidential. This will, or may (where we decide it is appropriate), include the following:

- (a) our staff and those who perform services on our behalf, have role-based access controls;
- (b) all our staff that have access to or handle personal information are trained to access and handle such personal information in compliance with applicable laws and this privacy policy;
- (c) access, use, modification and disclosure of information is secured by the use of firewalls and restricted access to databases;
- (d) information is stored and processed using secure services that undergo independent penetration testing to ensure vulnerabilities and threats are detected and addressed promptly.
- (e) Secure office access with restricted entry; and
- (f) locked filing cabinets for all client physical documents

11.2 In addition, we will not retain personal information for any longer than it is required by us except to fulfil our legal obligations or where you have consented.

12. ADVERTISING AND THIRD PARTY LINKS

12.1 Our website may contain links to a variety of advertising and third party website sources. Some of these links may request or record information from users or use cookies or other methods to collect information from you. We have no control over the content or privacy policy practices of those sites and encourage you to review the privacy policies of those sites before using them.

13. YOU MAY REQUEST ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

13.1 You may request access to and correction of the personal information we hold about you. This right is subject to some exceptions, for example you may not obtain access to information relating to existing or anticipated legal proceedings.

13.2 You can request access to or correction of any of the personal information about you that we hold or have published by emailing us at compliance@sfspw.co.nz or writing to us at Level 13, 29 Customs Street West, Auckland Central, Auckland 1010. We may charge a reasonable fee for providing you with our assistance (where personal information is made available), for making your personal information available, and for correcting your personal information, although we do not charge for updating basic personal information that we hold. We may require all or part of the fee to be paid in advance.

14. WHAT TO DO IF YOU THINK WE HAVE MADE AN ERROR

14.1 We are committed to protecting your privacy and our policies, processes and systems have been developed with this in mind. However, if you think we have made an error, please email us at compliance@sfspw.co.nz, or write to us at Level 13, 29 Customs Street West, Auckland Central, Auckland 1010 to let us know. Where we have made an error, we will endeavour to correct the error as soon as reasonably practicable.

15. QUESTIONS AND COMPLAINTS

- 15.1 If you have a question or complaint about the way we have dealt with your personal information, please contact us by email or in writing at the addresses above. We will endeavour to respond promptly to your question or complaint.

16. BREACHES OF YOUR PRIVACY

- 16.1 We take our privacy responsibilities seriously. In the unlikely event that a suspected or actual breach of your personal information occurs, we will investigate the breach. We will notify you (or give public notice if it is not reasonably practicable to notify you) and notify the Privacy Commissioner if we reasonably believe that the breach has caused you serious harm or is likely to cause you serious harm.

17. CHANGES TO POLICY

- 17.1 We may change this privacy policy at any time by publishing the amended privacy policy on our website. We will endeavour to inform you of any changes to the privacy policy by email or on the website.