

FIRST CAPITAL
FINANCIAL SERVICES
A Gallagher Company

Privacy Policy
2025

Purpose

Protecting your privacy and ensuring transparency about how we handle your information is essential to us. This Privacy Policy outlines how we comply with the New Zealand Privacy Act 2020 ("Privacy Act") concerning personal information management for our clients and users of our digital platforms (e.g., website and social media pages, if applicable).

This policy applies to First Capital Financial Services and its associated companies and authorised bodies.

Consent to Privacy Policy

By contacting us through our digital platforms, you agree to this Privacy Policy. If you do not agree, please refrain from using our digital platforms and contact us directly at 0800 525 515.

Collection of Personal Information

As defined by the Privacy Act, personal information pertains to identifiable individuals.

Types of Personal Information We Collect

We collect necessary personal information relevant to our interactions with you. We strive to collect this information directly from you and will inform you when we do so.

We primarily collect personal information:

- During in-person meetings
- Over the phone or via video calls (e.g., Microsoft Teams, Zoom, Skype)
- Through our digital platforms
- Via email or written correspondence
- Through marketing campaigns or similar events

When collecting personal information is not readily apparent, we will make efforts to clarify our actions.

Types of Personal Information Held

The personal information we collect may include:

- Name and date of birth
- Contact details (e.g., email, phone numbers, addresses)
- Family details (if applicable)
- Details regarding product/service usage
- Enquiry details
- Preferences (e.g., subscription preferences)
- Financial information (e.g., bank account details, tax status, your financial goals and objectives, information relating to your assets, liabilities and investments, and any other information that we may request or require in order to obtain a full understanding of your personal financial circumstances and objectives)
- Health information to support any insurance applications or claims:
Any health information held by us is subject to the additional protection of the Health Information Privacy Code 2020

- Identity verification documents
- Information necessary for assessing suitability for services
- Information about service usage and transactions
- Correspondence between you and us
- Information to meet legal and regulatory obligations.

We will only collect your personal information directly from you unless we obtain your prior consent to collect it from an authorised third party or when we are permitted to do so under relevant privacy laws.

We may also collect information about you from third parties, such as:

- Employers for the administration of the employee's superannuation or group insurance plan*,
- Parents or guardians in respect of children,
- Persons authorised by you, such as lawyers, accountants, or other professional advisers*,
- Medical, health or other treatment or rehabilitation providers*
- Publicly available sources*

* We are not responsible for the privacy or security practices of the above parties, and this Privacy Policy does not cover the parties described above.

Online Device Information and Cookies

When you visit our website or engage with our digital platforms, we may collect information using cookies to enhance your experience and gather usage data.

Purpose of Collection and Use of Personal Information

Any personal information provided to us may be used to:

- Provide services and products to you.
- Verify your identity.
- Market our services and products to you, including contacting you electronically (eg by text or email for this purpose)
- Improve the services and products that we provide to you.
- Respond to communications from you, including a complaint.
- Conduct research and statistical analysis (on an anonymised basis)
- Protect and/or enforce our legal rights and interests, including defending any claim.
- Complying with our legal and regulatory obligations
- For any other purpose authorised by you or the Act

We may also retain personal information to fulfil legal obligations or disclose to regulatory bodies.

Storage and Protection of Your Personal Information

We electronically store and secure personal information collected, taking reasonable steps to prevent unauthorised access or disclosure.

Timeframes for Keeping Personal Information

We retain information only as long as necessary or as required by law. After this period, we securely destroy or de-identify personal information. In the case of information related to our advisory services,

products, or services we have provided, we are required by law to hold this information for seven years.

Privacy Breach

In case of a privacy breach likely to cause harm, we will promptly secure and assess the breach, notify affected individuals, and inform the [Privacy Commissioner](#) as required.

Disclosure of Your Personal Information

We may disclose personal information when necessary to achieve the intended purpose, as required by law, with consent, or under the Privacy Act.

- Financial institutions that we engage with for the purposes of providing our service to you.
- Third parties to meet our regulatory or legal obligations and for the purposes of carrying out checks to satisfy our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009
- External and professional service providers that provide services to us
- A person who can require us to supply your personal information (e.g. a regulatory authority such as the FMA)
- Any other person authorised by the Act or another law (e.g. a law enforcement agency)
- Any other person authorised by you.
- Entities that acquire an interest in us.

Sending Your Information Overseas

Personal information may be sent overseas to fulfil our services, with appropriate safeguards and confidentiality obligations in place.

Third-Party Websites

We are not responsible for the privacy practices of third-party websites linked to our platforms.

Right to Access, Correct, and Delete Personal Information

You have the right to access, correct, or request deletion of your personal information. Contact us directly for assistance.

What Happens if You Do Not Provide Information

Not providing the requested information may affect our ability to provide certain services.

Changes to This Privacy Policy

We periodically update this Privacy Policy and notify significant changes directly or through our website.

Privacy Policy Queries and Concerns

For privacy-related concerns or complaints, please contact us. We aim to resolve complaints promptly and transparently.

If dissatisfied with our response, you may lodge a complaint with the [Privacy Commissioner](#).

Unique identifiers

We do not assign unique identifiers to our clients. Our policy is to use other means of identification that are sufficient for the purposes of our services and in compliance with the Privacy Act 2020. We ensure that all personal information is handled in accordance with the Act's principles, including those related to the use of unique identifiers.

Contact details:

151 Cambridge Terrace, Christchurch 8140, or

Email compliance@firstcapital.co.nz

Phone 0800 525 515

Website: firstcapital.co.nz

This revised policy aligns with the New Zealand Privacy Act 2020, ensuring clarity and compliance regarding personal information management.