

## Data Privacy Policy – NZ Shareholders Association

*This is our Privacy Policy, taking effect on January 1, 2021.*

Your privacy is critically important to us. At NZSA, we have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide through the operation of our services.
- We store personal information for only as long as we have a reason to keep it.
- We aim to make it as simple as possible for you to control what information we store.
- We aim for full transparency on how we gather, use, and share your personal information.

Below is our Privacy Policy, which incorporates and clarifies these principles.

### Who We Are and What This Policy Covers

At NZSA, we represent and support retail investors, including the provision of services to support the needs of retail investors and organising events and other activities – see our website for further details.

We also maintain a database of members to whom we send newsletters and, of course, some members who participate as volunteers to support our work.

This Privacy Policy applies to information that we collect about you when:

- You become a member of NZSA;
- You make and pay for a booking for an NZSA event;
- You sign up to be notified about our activities or receive our newsletter;
- You agree to participate in one of our events or activities;
- You purchase any product or service from NZSA.

Throughout this Privacy Policy we'll refer to our websites and other products and services collectively as "Services."

Below we explain how we collect, use, and share information about you, along with the choices that you have with respect to that information.

### Information We Collect

We only collect information about you if we have a reason to do so — for example, to provide our Services, enable you to modify or view those Services or to communicate with you.

### Information You Provide to Us

We collect information that you provide to us directly. Here are some examples:

- **Basic account information:** We ask for basic information from you when you make purchase any service or register an interest in an NZSA event. We require an email address, name and contact details (phone, address) in case of amendments to events. We may also ask you to set up a username and password to access your own information, although our current process may result in NZSA issuing a username and password on your behalf. That's it. You may provide us with more information — such as any specific requirements – but that is up to you!
- **Public profile information:** If you have an account with us, none of this information is exposed to the general public.
- **Payment and contact information:** If you buy something from us, we'll collect information to process those payments, including credit card data. This is NOT stored on the NZSA website, and NZSA cannot see your credit card details. We do keep a record of the purchases you have made.
- **Content information:** If you're a presenter at our events or one of our key people, eg member of our Branch Committees or Board , you might provide us with information about you including photos or biographies. In this case, it is likely that some of this information will be made available to the general public – including your name.

### Information We Collect Automatically

We also collect some information automatically:

- **Log information:** Like most online operators, we collect information that web browsers, mobile devices, and servers typically make available, including the browser type, date and time of access and other techie bits.

### Information We Collect from Other Sources

We don't collect information from other sources nor do we give your data to others.

### Purposes for Using Information

We use information about you for the purposes listed below:

- **To provide our Services.** For example, to set up and maintain your account, manage your booking and process payments and orders.
- **To contact you in the event of changes.** For example, a change in event dates or times.
- **To fix problems with our Services.** For example, by monitoring and responding to feedback.
- **To communicate with you.** For example, by emailing you with information on our activities (if you opt in).

### Legal Bases for Collecting and Using Information

This policy is based on the European Union standards, colloquially known as GDPR (General Data Protection Regulation).

1. The use is necessary in order to fulfil our commitments to you under the applicable terms of service or other agreements with you or is necessary to administer your account — for example, in order to enable access to our website on your device.
2. The use is necessary for compliance with a legal obligation; or
3. The use is necessary in order to protect your vital interests or those of another person; or
4. We have a legitimate interest in using your information — for example, to provide our Services; to contact you in the event of changes; to fix problems with our Services; to communicate with you; or,
5. You have given us your consent.

### **Sharing Information**

#### How We Share Information

NZSA does not share information with other parties without your consent. Potential situations where we may have to share data include:

- **Legal and regulatory requirements:** We may disclose information about you in response to a subpoena, court order, or other governmental request, such as Covid-19 contact tracing.
- **To protect rights, property, and others:** We may disclose information about you when we believe in good faith that disclosure is reasonably necessary to protect the property or rights of NZSA, third parties, or the public at large. For example, if we have a good faith belief that there is an imminent danger of death or serious physical injury, we may disclose information related to the emergency without delay.
- **Business transfers:** Highly unlikely – but in connection with any winding up of NZSA or acquisition of all or a portion of our business by another company, user information would likely be one of the assets that is transferred or acquired by a third party. If any of these events were to happen, this Privacy Policy would continue to apply to your information and the party receiving your information may continue to use your information, but only consistent with this Privacy Policy.
- **With your consent:** We may share and disclose information with your consent or at your direction.
- **Aggregated or de-identified information:** We prepare aggregated summaries of membership as part of our internal reporting. This does not go external to NZSA, and never identifies individuals.

We do not sell our users' data. We are not a data broker, we don't sell your personal information to data brokers, and we don't sell your information to other companies that want to spam you with marketing emails.

### Information Shared Publicly

**Event attendees:** Information about you is not shared by NZSA. While payment information is collected on our website, this is not managed by NZSA. Our payment provider maintains their own Privacy Policy in relation to your data collected for payment purposes.

**Staff, Key Persons (eg Board Members), Presenters:** Some photographs and biographical information will be used for publicity purposes in marketing campaigns, newsletters and on social media. Personal contact details are maintained for the use of key staff.

### **How Long We Keep Information**

We generally discard information about you when it's no longer needed for the purposes for which we collect and use it — described in the section above on How and Why We Use Information — and we're not legally required to keep it.

### **Security**

While no online service is 100% secure, we work very hard to protect information about you against unauthorised access, use, alteration, or destruction, and take reasonable measures to do so. We monitor our Services for potential vulnerabilities and attacks.

### **Choices**

You have several choices available when it comes to information about you:

- **Limit the information that you provide:** If you have an account with us, you can choose not to provide the optional account information.
- **Opt out of marketing communications:** You may opt out of receiving promotional communications or newsletters from us. Just follow the instructions in those communications or let us know.
- **Close your account:** While we'd be very sad to see you go, you can close your account or not renew your membership if you no longer want to use our Services. Please keep in mind that we may continue to retain your information after closing your account, as described in 'How Long We Keep Information' above.

### **Your Rights**

NZSA operates to a similar standard as required by law in the European Union.

Data protection laws give you certain rights with respect to your personal data, subject to any exemptions provided by the law, including the rights to:

- Request access to your personal data;
- Request correction or deletion of your personal data;
- Object to our use and processing of your personal data;
- Request that we limit our use and processing of your personal data; and
- Request portability of your personal data.

You also have the right to make a complaint to a NZ Privacy Commissioner.

### *Contacting Us About These Rights*

You can usually access, correct, or delete your personal data using your account settings and tools that we offer, but if you aren't able to or you'd like to contact us about one of the other rights, scroll down to "How to Reach Us" to, well, find out how to reach us.

When you contact us about one of your rights under this section, we'll need to verify that you are the right person before we disclose or delete anything. For example, if you are a user, we will need you to contact us from the email address associated with your account.

### **Controllers & How to Reach Us**

The controller of your personal data is always New Zealand Shareholders Association Incorporated. Please refer to our website for contact details.

### **Privacy Policy Changes**

Although most changes are likely to be minor, NZSA may change its Privacy Policy from time to time. NZSA encourages visitors to frequently check this page for any changes to its Privacy Policy. We will highlight and date any recent changes.