Thorners

solutions for you

Privacy Statement

Thorner Investment Services Ltd is committed to protecting your privacy. This privacy statement outlines how we collect, store, use and share your personal information, which we do in accordance with the Privacy Act 2020 (and any future legislative amendments). For more information on our full privacy policy please email deborah@thorner.co.nz.

By contacting us on this website, you consent to the use of your personal information in accordance with this privacy statement.

What information do we collect?

We may collect personal information about you, either directly from you or from other parties and we may generate information about you when we carry out our business.

Direct Collection:
The types of personal information we collect about you may include your:

- **Contact information**: your name, phone number, email address, postal address, physical address
- **Documents that verify your identity and other personal details**: such as your passport, drivers' licence number or date of birth etc
- **Subscriptions/preferences**: when you subscribe to receive our newsletter or updates, as well as content preferences to help us identify which material you want to receive
- **Technical information:** information about the device used to access the website or other social media sites, such as IP address, browser type, time zone settings and mobile network information.

Indirect Collection:
Indirect collection of personal information about you:

We sometimes collect personal information about you from third parties rather than directly from you. When we do that, we take steps to make sure that you are aware of the collection, the reason for it, who the information may be shared with, and who we are.

You have the right to request confirmation of whether we hold any of your Personal Information and access to that information. You may also request that your Personal Information be corrected if you think it is inaccurate, incomplete or out of date. Please email peter@thorner.co.nz should you require any information regarding this.

Please refer to the Indirect Collection Source Schedule below. It lists the third parties we commonly collect from, the types of information involved, the purpose of collection, and the intended recipients.

Indirect Collection Source Schedule:

Third party	Information exchanged	Purpose	Law basis	Notice method
Identity verification provider - **GBG**	**Information sent by us** to GBG may include: Client identity data (name, DOB, address, document images). **Information received by us** from GBG may include: Verification result (pass/fail, watchlist/PEP screening outcome)	Meet identity verification and compliance requirements	Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) Act 2009	Scope + schedule
Referrer – An individual or company that you have instructed to contact us on your behalf	**Information received by us** may include: Client name, contact details, and limited context for the introduction (one-way: no information is typically sent to the referrer)	Make first contact and understand the reason for referral	Not applicable	Referral first-contact notice
Power of Attorney (POA) - An individual or company that you have instructed to act on your behalf	**Information received by us** may include: Client name, contact details, changes to the clients situation and establishment of communication to discuss your investments with your POA. **Information sent by us** to POA is current and ongoing communication regarding the management of your investment	Provide continuity of service in the event that you are unable to make rational decisions regarding your investments	Protection of Personal and Property Rights Act 1988 (PPPRA)	Ad hoc - Standalone
Joint account holder	**Information received by us** may include: changes to the clients situation and further financial information. **Information sent by us** to a joint account holder will be in regard to the joint investment and include: current and ongoing communication regarding the management of your joint investment	Provide continuity of service in the event that you are unable to attend investment/ review meetings	Not applicable	Ad hoc
Accountant/ Lawyer/ other professional bodies as specified by you	**Information sent by us** may include: Advice, reports, or compliance outputs delivered to the specified professional in order that they may carry out their specific function for you. Typically one way communication however **Information received by us** may include: changes to the clients situation and further financial information.	Accounting, legal, or compliance services	Depends on context	Ad hoc Standalone

What do we do with it?

We collect and use your personal information to provide the information and services that you request from us, and to provide you with information about other services we consider appropriate.

When necessary, we may use your information to:

- Comply with our legal and regulatory obligations (including Anti Money Laundering/Counter Financing of Terrorism compliance and audit and reporting requirements).
- Defend or enforce our rights - For example, to collect money owed to us.
- Assess and manage your investment planning needs

Who do we share it with?

Besides our staff we may share this information with third parties who enable us to provide you with our services. These include:

- Your other professional advisers
- Product providers that Thorner Investment Services has an agreement with
- Our service outsource providers such as IT consultants, Custodians, etc.

We will only share your personal information with third parties where it is necessary to help us do what we collected your information for, where it is required by law or where you give us authority to.

We require these third parties to adhere to our strict confidentiality requirements for handling personal information, and we seek to ensure that they comply with the Privacy Act 2020.

Where do we store it?

We use third party cloud service providers to store and process the information we collect. We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

We take all reasonable steps to protect any personal information that we hold from misuse, interference, and loss, and from unauthorised access, alteration and disclosure. However, data protection measures are never completely secure and, despite the measures we have put in place, including the encryption of any sensitive information that is emailed to a client, we cannot guarantee the security of your personal information. You must take care to ensure you protect your personal information. You should notify us as soon as possible if you become aware of any security breaches. Where required by law, we will notify you of any notifiable privacy breach concerning your personal information.

What are my rights?

You do not have to provide information to us. If you choose not to provide necessary personal information when requested, we may be unable to provide certain information or services to you.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you have any questions about this privacy statement or you would like to ask for a copy of the information we hold on you, or to have it corrected, please contact us 04 939 2902 or peter@thorner.co.nz.

Disclaimer: While every care has been taken to supply accurate information, errors and omissions may occur. Accordingly, Thorner Investment Services Ltd accepts no responsibility for any loss caused as a result of any person relying on the information supplied.