

## **Pathfinder Asset Management Privacy Policy**

Welcome to Pathfinder Asset Management Limited (**Pathfinder, we, us, and our**) Pathfinder's Privacy Policy which is current as at 1<sup>st</sup> December 2020.

At Pathfinder we care deeply about the privacy of our visitors and users, and we are fully committed to protecting their personal information and using it properly in compliance with data privacy laws. This policy describes how we may collect and use personal information, and the rights and choices available to our visitors and users regarding such information.

We strongly urge you to read this policy and make sure you fully understand it before you access or use any of our services.

### **Information**

We can gather information about you and other users of our websites, which may include:

<b>Description of information gathering</b>	<b>Examples</b>
personal information through your voluntary use of the Pathfinder and/or CareSaver websites and the Newsletter subscription	your first and last names, email address and other information used to identify you, to process your application to join the Pathfinder Managed Investment Scheme and/or the CareSaver KiwiSaver Scheme, or maintain a service or your accounts with Pathfinder
personal information provided to us by you through any other method	email correspondence or your phone or online chat discussions with us
information collected by us through click tracking in relation to your use of the Websites or newsletter	the content you download, the content you access, page response times and length of visits to certain pages
the use of aggregated data	tracking of overall traffic to the Websites (this does not identify you individually)
the use of cookies	cookies are pieces of information transferred to your computer hard drive for record keeping. This is described in more detail below.

### **Security**

We are committed to ensuring that your information is secure. In order to prevent loss, unauthorised activities, and other misuse we have put in place procedures to safeguard and secure the information we collect.

We can store your information physically or electronically ourselves or with other contracted agencies, which we believe are subject to the Privacy Act 2020 ("**Privacy Act**" or "**Act**") or privacy laws that provide comparable safeguards to those in the Act. to hold the information for us. As well as New Zealand, your information may be held offshore in certain jurisdictions including, without limitation, the United States and Australia. We, including the contracted agencies we use, take reasonable steps to keep your personal information safe from unauthorised use or disclosure.

### **Purpose of collecting your information**

We only collect personal information from yourself or any other person authorised by you.

We will never sell or rent your personal information to third parties.

We may use your personal information

- to conduct our normal business (including opening and managing your account)
- to verify your identity
- to comply with all applicable laws including our anti-money laundering and foreign tax disclosure requirements
- to help us manage and enhance our services
- to communicate with you, including responding to a complaint
- to protect and/or enforce our legal rights and interests, including defending a claim
- to market and advertise our services to you
- for any other purpose authorised by you or the Privacy Act

### **Disclosing your personal information**

After taking reasonable steps to ensure the information is accurate, up to date, complete, relevant and not misleading, we may disclose your personal information to

- another company within our group (if any);
- any business that assists us with the purposes above or who perform functions on our behalf (such as data storage, IT systems, the Supervisor or the administrator of the Pathfinder Managed Investment Scheme). These third parties may be subject to overseas laws which may require them to disclose your information. Any disclosure to offshore parties will be subject to the terms of the Privacy Act;
- other companies, agencies or individuals that maintain databases against which your identity may be verified including, but not limited to, the NZTA, the New Zealand Department of Internal Affairs, the Companies Office, Centrix Group Limited and the Australian Document Verification System;
- a person who can require us to supply your personal information including, but not limited to, a regulatory authority;
- any other person authorised by the Privacy Act, or other law including, but not limited to, a law enforcement agency;
- organisations conducting market research, data processing and statistical analysis for us;
- yourself or any other person authorised by you.

### **Email Newsletters and other notices**

It is our policy to send Newsletter emails that you elect to receive. In addition, we may send out promotional material or news to you. This may include promoting new or amended material on our site where we think that may be relevant to you. We will remove you from our mailing list upon your request.

From 1 December 2020, we will notify you and the Privacy Commissioner if we are aware a notifiable privacy breach, as defined under the Privacy Act, has occurred, and you are affected.

### **Cookies**

Cookies are widely used on most major websites. These are small pieces of information that are stored in a browser-related file on your computer's hard drive when you use a website. Overall, cookies help us provide you with better websites, by enabling us to monitor which pages you find useful and which you do not. This helps us analyse data about web page traffic and tailor our websites to your needs. A cookie in no way gives us access to your computer or any information about you other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may, however, prevent you from taking full advantage of our websites.

### **Links to other websites**

Our websites may contain external links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Other information we collect**

We may collect and use additional information to carry out internal research on our users' demographics, interests, and behaviour, to better understand and serve you and our other online users. This information may include the URL that you just came from (whether this URL is on our site or not), which URL you next go to (whether this URL is on our site or not), what browser you are using, and your IP address.

If you post on our site, on LinkedIn or Facebook or other social media site about us or your experience with us, we may collect that information for the purposes of improving our service and the end user experience.

### **Access and removal of Information**

You have the right to access to the personal information held about you and to ask us to correct any inaccuracy. There are some exceptions to this right, set out in the Privacy Act. If you make an access request, we will ask you to verify your identity and specify what information you require. If you are concerned about how your personal information is being handled or if you would like to make a complaint, please contact us on the details listed at [www.path.co.nz/contact-us](http://www.path.co.nz/contact-us). If you are unhappy with our response, there are other bodies you can go to as listed on the Product Disclosure Statement. We will not keep your personal information longer than is required for the purpose which the information may be used. Out of date or inaccurate information will be automatically removed from our system.

### **Updates to our information practices**

We reserve the right to change this policy. By continuing to use our service, including the Websites, you agree to be bound by the amended policy. You should check from time to time to see if the policy has changed.