

# HURFORD PARKER PRIVACY POLICY



At Hurford Parker Insurance Brokers Limited we are committed to protecting your privacy. We are bound by the New Zealand Privacy Act 2020. This Act sets out:

- how we collect, use, hold and disclose your personal information that you have provided.
- How to provide individuals with access to information about them held by Hurford Parker Insurance Brokers Limited.

The Act gives the Privacy Commissioner a power to issue codes of practice, which may modify the effect or operation of the Act in respect to particular sectors, industries, occupations, or activities.

Under the Act, individuals have a right to request access to personal information about them held by an organisation, and to seek corrections to that information if the individual considers it to be incorrect.

## **What is Personal Information**

As defined by Privacy Act 2020, personal information means information about an identifiable individual; and also includes information relating to a death that is maintained by the Registrar-General under the Births, Deaths, Marriages, and Relationships Registration Act 1995 or any former Act (as defined in section 2 of the Births, Deaths, Marriages, and Relationships Registration Act 1995)

## **What kind of Personal Information do we hold**

As a Financial Advice Provider, we collect many pieces of personal information. This enables us to carry out our Advice Process and provide recommendations on products that are fit for purpose for the clients situation. This is generally; but is not limited to:

- Your contact information; full name, address, email address, contact number, postal address
- Your date of birth
- Your employment status and details of employment (depending on advice sought)
- Existing Insurance details (personal risk and general) and mortgage information (if applicable)
- Billing information such as bank account name and number, direct debt form (for premium funding contract)
- Criminal record
- Health information (if seeking advice for risk and health products)

## **Gathering Personal Information**

We will only gather and hold your personal information by lawful means and where it is needed for the advice that we are providing. We will gather information from you or companies that you have provided signed authority for us to do so via an Information Release Authority.

This information may come from other insurance providers or mortgage providers. We may consult healthcare providers if it is necessary to do so to complete our advice process.

All information will be collected on our own secure data storage device.

In return for the assurance that HURFORD PARKER INSURANCE BROKERS LIMITED will observe the information privacy principles set out in the Privacy Act, employees and other persons are presumed to authorise at the time of their engagement the collection, storage, use, and disclosure of personal information.

### **Access to your information**

Employees and other persons may request access to any personal information about them which HURFORD PARKER INSURANCE BROKERS LIMITED might have. Requests for access to personal information may be made directly to the person or department where the information is believed to be held. Alternatively, requests may be made to management.

The person who receives a request for access to personal information must respond without undue delay. In most cases, the individual making the request will be able to inspect the information in the form in which it is held or stored and, where appropriate and if requested, be provided with a printed or electronic copy.

The person who receives a request for access to personal information may consider that the request raises issues that need further consideration. The request must then be referred to management for a decision. That decision must be made and communicated to the individual concerned within 20 days of the date on which the request for access was received.

### **Refusing access to personal information**

In limited circumstances, a request for access to personal information from an employee may be declined. A decision to decline a request must be discussed with, and approved by Management.

A request for access may be declined if the information concerned is evaluative or opinion material.

A request for access may be declined if disclosure of the information concerned would:

- lead to the unwarranted disclosure of the affairs of another person
- breach a promise to a person who supplied evaluative material that the information or the identity of the person who supplied it or both would be held in confidence
- be likely to prejudice the physical or mental health of the individual concerned
- be contrary to the interests of an individual under the age of 16
- breach legal professional privilege

A request for access may be declined, with the approval of management, where:

- the request is frivolous or vexatious
- the information requested is trivial
- the information requested is not readily retrievable
- the information requested does not exist or cannot be found, and there is no reason to believe that the information is held by another agency.

If a request for access to personal information is declined, the individual who made the request must be given, in writing, the reason or reasons for the refusal. An explanation of the reason or reasons should be given if requested. The person who made the request must be told that the refusal may be reviewed by the Privacy Commissioner or an Ombudsman.

## **Correcting personal information**

An individual or representative of a company who is a client, who believes that any personal information about them is not accurate may ask for the information to be corrected.

The request for a correction should be made in writing and specify the change or changes that the individual or representative wishes to have made. The request should be made directly to the person who holds the information or to management for employees and Adviser for Clients.

If warranted, the requested correction will be made.

If correction is considered to be unnecessary or unwarranted, the individual must be advised accordingly. The individual or representative may then ask for the requested correction to be attached to the information concerned, so that it is visible whenever others have access to the information.

## **Information provided outside New Zealand**

Our organisation may only disclose personal information to an agency outside of New Zealand if the receiving agency has similar safeguards to those in the NZ Privacy Act and adequate data protection is guaranteed. If a jurisdiction does not offer similar protections, the individual concerned will be fully informed that their information may not be adequately protected and they must expressly authorise the disclosure.

## **Procedure for making complaints of interference with privacy**

Employees and Clients may complain to HURFORD PARKER INSURANCE BROKERS LIMITED that there has been interference with their privacy, and that this has caused them loss or damage, adversely affected their rights or interests, or resulted in significant humiliation, loss of dignity or injury to their feelings.

As an alternative, under the Privacy Act, complaints may be made to the Privacy Commissioner or an Ombudsman.

Employees and others who wish to complain that there has been interference with their privacy should first approach the person responsible for the alleged breach. If that is not possible or appropriate, or the outcome of the approach does not satisfy the complainant, the complaint should be made again to management for employees and the adviser for Clients. The complaint may be made in person or in writing.

HURFORD PARKER INSURANCE BROKERS LIMITED aims to investigate and resolve any complaint speedily and informally if possible.

An employee or client who wishes to make a formal complaint that there has been interference with their privacy should set out the complaint in writing with the details and circumstances of the alleged interference. This will be delivered to Management.

Management will investigate the complaint as quickly as possible. The complainant, who may have the support or assistance of a representative or other person(s) chosen by the employee, will have the opportunity to contribute to the investigation.

The investigation will aim to achieve speedy resolution or satisfaction of the complaint. If that is not possible, and the complaint is upheld by the investigation, the matter may become the subject for training, counselling or disciplinary action.

The complaint and the outcome of the investigation are to be recorded and included on the employee's personal file or in the Clients file.

If our business has a privacy breach that we believe has caused (or is likely to cause) serious harm, we will notify the Office of the Privacy Commissioner and affected individuals as soon as possible.