



SMARTMORTGAGES.CO.NZ LIMITED PRIVACY POLICY (IPP3A COMPLIANT)

1. Introduction

Smartmortgages.co.nz Limited (“we”, “us”, “our”) is committed to protecting your personal information in accordance with the Privacy Act 2020 (New Zealand), including Information Privacy Principle 3A (IPP3A) relating to indirect collection of personal information.

We recognise that being transparent about how we collect, use and share your personal information is essential to building trust and delivering our services.

2. What personal information we collect

We collect personal information necessary to provide mortgage advice and related services, including:

- Identity information (e.g. name, date of birth, contact details)
- Financial information (e.g. income, assets, liabilities, credit history)
- Employment and business details
- Property and lending requirements
- Supporting documents (e.g. bank statements, ID, contracts)

We only collect information that is necessary for providing our services or meeting legal and regulatory obligations. If you choose not to provide requested information, we may not be able to provide our services.

3. How we collect your personal information

Direct collection:

- Contact us or make an enquiry
- Complete forms or applications
- Provide supporting documentation

By providing your personal information, you consent to us collecting, holding, using and sharing that information for the purposes outlined in this policy.

Indirect collection (IPP3A):

- Referral partners (e.g. real estate agents, accountants, family or friends)
- Online platforms (e.g. Facebook, websites, lead providers)
- Product providers (banks and lenders)
- Credit reporting agencies
- Government agencies and public registers
- Other advisers involved in your financial affairs

We will take reasonable steps to inform you when collecting information indirectly, including purpose, recipients, and your rights.

4. Purpose of collecting your information

- Provide mortgage advice and recommendations
- Assess your eligibility for lending
- Submit applications to lenders
- Verify your identity and meet AML/CFT obligations
- Communicate with you
- Meet legal and regulatory requirements

5. Sharing your personal information

- Banks and lenders
- Credit reporting agencies
- Valuers, insurers and legal professionals
- Service providers
- Authorised contractors, associates and administrative support staff located in New Zealand and overseas (including Vietnam) who assist

with administrative and data entry services. These individuals are subject to confidentiality obligations and are only permitted to access personal information necessary to perform their duties.

- External auditor
- Regulatory bodies

6. AML/CFT and identity verification

We may verify your identity using electronic providers, government agencies and credit bodies.

7. Storage and security

- Secure systems
- Restricted access
- Protection from misuse
- Password-protected systems and multi-factor authentication
- Confidentiality obligations for authorised staff, contractors and associates
- Access to personal information limited to what is necessary for their role

8. Your rights

- Request access to your personal information
- Request correction of your personal information

9. IPP3A exceptions (when we may not need to notify you)

- You already know
- The information is publicly available
- Legal exceptions such as fraud investigation

10. Contact

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