

# Privacy Statement

## Our commitment to protect your privacy

Max Money Group Limited trading as Max Loans, Max Mortgages, Max Insurances & Max Businesses (referred to in this Privacy Statement as "we", "our" or "us"), take the privacy and protection of your information very seriously.

We understand how important it is to protect your personal information and as such we are committed to protecting the personal information we hold on our customers, partners and employees and to complying with our obligations under the Privacy Act 2020 (the Privacy Act) and its 13 information privacy principles (IPPs). This Privacy Statement has been written to help you understand how we collect, store, use and share your personal information in accordance with these obligations.

In this Privacy Statement, we refer to any information that can uniquely identify an individual (including the information described below) as "personal information". This Privacy Statement has been written to help you understand how we collect, store, use and share your personal information when visiting any of our websites, including [www.maxmoneygroup.co.nz](http://www.maxmoneygroup.co.nz); [www.maxloans.co.nz](http://www.maxloans.co.nz) ; [www.maxmortgages.co.nz](http://www.maxmortgages.co.nz); [www.maxinsurances.co.nz](http://www.maxinsurances.co.nz); [www.maxbusinesses.co.nz](http://www.maxbusinesses.co.nz) (the Websites), or when otherwise accessing our products and services.

## Your authorisation

By providing us with personal information, including by accessing the Websites, using our products and services, or otherwise engaging with us, you acknowledge that you have read and understood this Privacy Statement and consent to the collection, storage, use and sharing of your personal information in accordance with the terms set out in this Privacy Statement.

We reserve the right to update this Privacy Statement at any time and for any reason, so we encourage you to make sure that you are familiar with the current version of our Privacy Statement.



## What is personal information?

Personal information is information about an identifiable individual. It includes (but is not limited to) name, address, contact details, date of birth, occupations, payment details, employment history and/or details, education and qualifications, financial information, testimonials and feedback, evidence of source of funds or source of wealth (in some cases) and other information.

## Why do we collect personal information?

We only collect personal information to conduct our business, to provide you (if you are a client) our services, emailing updates, event invitations and publications that we think you may be interested in, and to meet all our legal obligations (including in relation to anti-money laundering and countering financing of terrorism legislation).

We will only collect personal information if it is for a lawful purpose connected with the products and services that we offer, and the information is necessary for these purposes.

You do not have to voluntarily provide your personal information to us. However, if you do not provide us with certain personal information we request, we may not be able to provide our services to you or perform our obligation.

## What information do we collect?

We may collect personal information about you, either directly from you or other parties and we may also generate information about you when we provide our products and services. The types of information that we may collect about you will depend on the purpose for which it is collected, but may include:

- Contact Information: such as your name, phone number(s), address(es) and email address(es);
- Documents to verify your identity: such as your passport or driver licence;
- Credit bureau information: such as credit history, anti-money laundering and financial terrorism information;
- Financial information: such as bank statements, statement of position, income, sources of wealth and value, liabilities;
- Your IRD number, tax status, residency status;



- Employment history: such as your past and current employer(s), position, salary and work history;
- Security details: such as vehicle details, property information and personal and business assets;
- Subscription preferences: such as when you subscribe to receive our newsletter or updates, as well as content preferences that help us provide material you want to receive.

## How do we collect your personal information?

Except as otherwise permitted by law, most of the personal information we collect is provided directly by you, or your authorised representative. We collect personal information about you when you visit our website, participate in any of our surveys, request (over telephone, email, social media such as Facebook) our advice or service, ask us to send you our publications (such as newsletters), or when you otherwise interact with us. Please be aware that when you send us any information over the internet you send it at your own risk because the internet is inherently insecure. Accordingly, any personal information which you transmit to us online is transmitted at your own risk.

We may also collect personal information from you through registration and attendance at seminars, business cards, and social media channels.

In some instances, we may collect your personal information from third parties - for example:

- we may use third parties to analyse traffic at our websites, or to provide information security related services, and social media channels, which may involve the use of cookies;
- in some circumstances we might collect personal information about an individual from a third party, such as an employment reference from another person;
- we may collect personal information about you from publicly available websites;
- we may collect your personal information from Product Provider(s) for loans(s) or insurance(s) that we have arranged on your behalf. This is so that we can answer your queries or assist you with your financial arrangements. If applicable, the Product Provider(s) may also periodically disclose your loan balance, premium or sum insured to us in connection with the payment of ongoing commission to us over the term of your loan or insurance.

If you provide any personal information about anyone else to us, you confirm that you have collected that personal information in accordance with the Privacy Act 2020 and that the individual concerned has authorised you to disclose that information to us.



## Cookies

By using or accessing this website, you are giving consent to Max Money Group Limited for using cookies to collect data about each visit to this website. Cookies are text-only pieces of information that a website transfers to an individual's hard drive or other website-browsing equipment for record-keeping purposes. Cookies allow the website to remember important information that will make your use of the site more convenient. A cookie will typically contain the name of the domain from which the cookie has come, dates and times of visits, pages accessed, documents opened, and links clicked, and a randomly generated unique number or other value. Like most websites, we use cookies for a variety of purposes to improve your online experience, for analytics and for marketing. Information collected may be used by third party vendors, including Google, to show you related ads on sites on the internet. Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to websites. Users may opt out of Google's use of cookies by visiting the [Google advertising opt-out page](#). Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. 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.

Session cookies are temporary cookies that remain in the cookie file of your browser until you leave the website.

Persistent cookies remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie). When we use session cookies to track the total number of visitors to our website, this is done on an anonymous aggregate basis (as cookies do not in themselves carry any personal data). We may also employ cookies so that we remember your computer when it is used to return to the website to help customise your experience of website use. We may associate personal information with a cookie file in those instances. Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. You can easily delete any cookies that have been installed in the cookie folder of your browser.

## How do we use your personal information?

We may use your personal information:

- for the purposes outlined in this Privacy Statement



- to help provide you with our products and services
- to help manage our relationship with you
- to advertise products, or services we or third parties offer

We may use your personal information without your knowledge or consent where we are permitted or required by regulatory requirements or applicable law to do so.

We may use your personal information to provide you with targeted advertisements or marketing communications.

### To whom might we disclose personal information?

We may disclose your personal information to:

- other companies or individuals who assist us in providing services or who perform functions on our behalf (such as mailing houses, hosting and data storage providers, specialist consultants and legal advisers);
- Product providers (such as but not limited to lenders and insurance companies);
- Financial advisers and financial advice providers who may use our services;
- other companies or individuals who perform checks (such as but not limited to compliance reviews and audits) that are necessary or desirable under law on our behalf;
- other companies, agencies or individuals that maintain databases against which your identity may be verified, which may include (but is not limited to) the New Zealand Department of Internal Affairs, and New Zealand Transport Agency;
- social media sites on which we may have a presence;
- courts, tribunals and regulatory authorities (such as the Financial Markets Authority, and Ministry of Justice in New Zealand);
- Office of the Ombudsman, where a complaint relates to official information;
- any person or agency we believe could assist in responding to a serious privacy breach;
- Office of the New Zealand Privacy Commissioner, where a complaint relates to breach of the Privacy Act 2020;
- Human Rights Commission, where a complaint relates to discrimination;



- CERT NZ, where appropriate to assist with the management of a voluntarily notified privacy breach;
- Overseas privacy regulator, where a complaint relates to the actions of an overseas agency; and
- anyone else to whom you authorise us to disclose it.

Except as described above, we will not disclose your personal information without your written or oral consent, unless we are required to do so by applicable law.

If you have applied for a loan or insurance in conjunction with another applicant, each of you acknowledge and agree that:

- you consent to us providing your personal information to the other of you; and
- we will be entitled to accept instructions from either of you in respect to the access of, use of, and amendment to, your personal information by us.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that such third-party has a commitment to protecting your personal information at least equal to our commitment.

### **Where do we store your personal information?**

We use third party cloud and data storage centres (Microsoft Azure, AWS, Salesforce) to store and process the information we collect. The cloud storage and IT servers maybe located outside of New Zealand.

Where your personal information is transferred outside New Zealand, we will ensure the intended recipient has provided appropriate safeguards and that requisite rights and remedies in relation to the personal information remain available, or we will obtain your explicit consent for the transfer.

### **How do we manage your personal information?**

We take reasonable steps to protect the security of personal information. All our personnel (including but not limited to third party service providers) are required to hold personal information and the privacy of individuals in confidence.

We take reasonable steps (such as, but not limited to, use of physical security and restricted access to



electronic records) to protect personal information we hold from misuse and loss and from unauthorised access, modification, or disclosure.

Where we no longer require your personal information, we will comply with our legal obligations in respect of that information.

## Unique identifiers

We may assign you a unique identifier to enable our processes and systems to function efficiently during the provision of our products and services to you.

We may also capture information that uniquely identifies you such as your IRD number, Visa residency number, driver licence or passport number if required to enable the provision of our products and services to you.

## What are your rights to accessing and correcting your personal information that we hold?

You have the right to request access to any personal information we hold about you, and to ask for it to be corrected if you think that it is wrong. If you'd like to exercise that right, or ask us anything else in relation to your privacy, you can contact us at:

Write to:                   The Privacy Officer  
Max Money Group Limited  
D1, 27-29 William Pickering Drive, Rosedale, Auckland, New Zealand, 0632

Email:                     [info@maxmoneygroup.co.nz](mailto:info@maxmoneygroup.co.nz) (for all)  
[info@maxloans.co.nz](mailto:info@maxloans.co.nz) (for Max Loans)  
[info@maxmortgages.co.nz](mailto:info@maxmortgages.co.nz) (for Max Mortgages)  
[info@maxinsurances.co.nz](mailto:info@maxinsurances.co.nz) (for Max Insurances)  
[info@maxbusinesses.co.nz](mailto:info@maxbusinesses.co.nz) (for Max Businesses)

Phone:                    0800 ASK MAX (0800 275 629)  
09 913 3011



## Product Provider Specific Acknowledgements

Product Providers may have specific information that requires your acknowledgement. This can be read and accepted in conjunction with this Privacy Statement.

### PRIVACY NOTICE – LATITUDE

ACKNOWLEDGEMENT: to the creditor, Latitude Financial Services Limited, PO Box 4058, Shortland Street, Auckland 1140 (“Latitude”).

#### Important Privacy Notice

I/We understand there is no obligation to provide personal information, including biometric information, driver licence details, but if I/we fail to supply any information requested, or do not agree to any of the disclosures detailed in this acknowledgement, my/our application may not be accepted.

I/We certify that all information contained in this application is true and correct, and where applicable, I have the permission of my spouse/partner to disclose his/her personal information.

I/We authorise Latitude to collect my information and conduct an identity verification check to verify my identity and address as required under Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act). I understand that as part of this identity verification process, my biometric information (a selfie photo and a short selfie video) may be collected and compared to the photographic identity document provided to verify my identity against my claimed identity.

Additionally, biometric information may be collected to counter identity fraud and minimise security risks, where applicable. I agree that this authority may be provided to an external identification service provider for the purpose of identity verification.

I/We authorise Latitude to make all necessary enquiries and receive information concerning my/our credit rating, any outstanding fines, residence, employment and my/our identity from other credit providers, credit reporters, identity verification service entities, government agencies, employer, accountant, or other named persons, or relatives and, where applicable, to obtain such information relating to my/our driver licence(s) from NZ Transport Agency as is authorised by the Land Transport Act 1998, for the purpose of considering this application, the administration and protection of any credit provided and considering any future request for further finance on my account. I/we agree that this





authority may be provided to such parties for these purposes. I also agree that my personal information may be shared with NZ Post, any Gem Visa merchant, or any other entity employed, engaged, or appointed by Latitude for the purpose of verifying my identity.

I/We understand that Latitude will give my/our personal information to credit reporters and that those credit reporters may hold the information on their systems and disclose it to authorised users of the credit reporters' services. I/we also understand that information about my creditworthiness and credit history may be disclosed to any credit provider named in a credit report relating to me/us.

I/We acknowledge that if Latitude provides finance it may collect and monitor such personal information about me/us as is necessary for the administration and protection of such credit (including without limitation utilising any credit reporters monitoring services to receive updates if the information held about me/us changes), and may disclose repayment history information, details relating to my/our account, and any payment default information to credit reporters which may hold the information on their systems and disclose it to authorised uses of the credit reporters services. Latitude may also (if necessary) disclose my/our personal information to fraud reporting agencies and to any person Latitude may appoint to assist in enforcement of any agreement between Latitude and me/us.

Where my application is initiated via a broker website, I agree that my information may be shared with that merchant for the purpose of marketing its products and services.

I/We authorise Latitude and all of its related entities to share and use all personal information held about me/us now or in the future to offer me/us now or in the future to offer me/us further finance, to consider any future application of finance from me/us, and to offer or provide me/us with details of other products and services from time to time.

I/We agree that Latitude and its related entities may communicate with me/us via mail, email, or telephone (including SMS/MMS) for all purposes and understand that there may be security risks relating to the electronic transmission of information, and that Latitude cannot guarantee confidentiality.

The personal information will be held by Latitude. Where the personal information may readily be retrieved, I/we shall have access to it and the right to request correction.



If my/our application is approved, I/we consent to all disclosure documents required for the purpose of the Credit Contracts and Consumer Finance Act 2003 being sent either by mail or in electronic form. and by means of electronic communication (either by email or accessible from a website or by means of the Internet). I understand that if I withdraw this consent at any time, I may be required to pay a fee to cover the cost of providing paper statements.

### **Financial Advice – Prescribed Statement Disclosure**

You are protected by responsible lending laws. Because of these protections, the recommendations given to you by Latitude about personal loans, credit cards and any credit related insurance products are not regulated financial advice. This means that duties and requirements imposed on people who give financial advice do not apply to these recommendations. This includes a duty to comply with a code of conduct and a requirement to be licensed.

### **Commission Disclosure**

I/we understand Max Money Group Limited (FSP 564207) trading as “Max Loans” will receive a commission from Latitude Financial Services Limited for the referral and settlement of my/our personal loan application for which financial advice was received.

AUTHORISATION: to the creditor, Latitude Financial Services Limited, P O Box 4058, Shortland Street, Auckland 1140 (“Latitude”).

### **My Financial Adviser Authorisation**

I/we understand that my/our application for credit from Latitude may be made in writing on Latitude’s forms, or electronically via Latitude’s online application system. I/we confirm that I/we wish to make an application electronically.

I/we have authorised my financial adviser to complete and submit my/our application electronically, on my/our behalf and in my/our name, and to provide any additional information or documentation requested by Latitude, as if I/we were making the application and providing such information and documentation myself/ourselves.

I /we hereby authorise Latitude to accept any application made in my/our name and to rely on such



application, with no need for further enquiry as to whether the application was made by me/us or my financial adviser. I/we authorise Latitude to communicate with my financial adviser directly about my/our application and to rely upon the correctness of the content of any such application or information provided on my/our behalf by my financial adviser.

## **PRIVACY STATEMENT– AVANTI GROUP**

This Privacy Statement covers Avanti Finance Limited, GetCapital Limited & Branded Financial Services (NZ) Limited (together referred to in this “Privacy Statement – Avanti Group” section as “Avanti”, “they”, “their” or “them”).

### **The Information Avanti Collects**

The personal information which Avanti collects about you may include:

- information about your identity, like your name (and any previous or other names you are or have been known by), age, gender, identification, biometric data and image;
- your contact details, like your address and or current whereabouts, telephone number and email address (including any arrival and departure records held in New Zealand);
- financial information, like your income, expenses and liabilities and banking history;
- information about your past and current bank accounts, including bank statements;
- your involvement in (or relationship to) any corporate entity or trust;
- information about your credit history, current credit obligations and financial position;
- information about your assets, including those over which they may take security;
- information about your employment and the type of work you do; and
- other information you share with us(Max Money Group Limited) and/or Avanti about your personal situation, the type of product or service you would like to apply for and your plans, like plans to start a family or your own business.



Providing your personal information and allowing Avanti to use it in accordance with this privacy statement is optional, but without it they will not be able to consider your application or provide you with the product or service you have asked for.

### **Why Avanti Collects It**

Avanti collects your information in order to:

- assess your application for a product or service from them, including verifying your credit history, current credit obligations and financial position;
- monitor your current credit obligations and financial position, including your payments and any defaults;
- help them to administer any product or service they have provided to you;
- exercise their rights or perform their obligations under any agreement they have with you, including their right to collect any money you owe them;
- comply with their legal obligations, including those relating to money laundering and terrorist financing and consumer credit contracts; and
- comply with their internal operational requirements, such as for credit and risk management, product or system development and planning, insurance, audit and administration purposes.

Avanti also collects it in order to be able to provide you with information about their other products or services, or the products or services of third parties that they administer, including targeted marketing (but you can opt-out of receiving this kind of information by contacting Avanti at

[info@avantifinance.co.nz](mailto:info@avantifinance.co.nz)

### **Who Avanti Collects It From And Shares It With**

Sometimes Avanti will collect personal information directly from you when they interact with you.

Avanti may also request (and collect) personal information about you from, and share personal information about you with, public sources, like social media websites or public registers, and other third parties, such as:

- third parties who introduce you to them, like introducers, brokers or motor vehicle dealers;



- identification verification agencies;
- credit reporting agencies;
- your representatives or advisors, such as your solicitor or accountant;
- any registered bank or other credit providers in New Zealand;
- your past and present employers;
- your past and present service providers, including your telecommunications providers;
- government agencies and services, including NZ Customs Service, the Ministry of Justice, Department of Corrections, New Zealand Police, the Ministry of Social Development (including Work and Income), Immigration New Zealand, Inland Revenue Department, Kāinga Ora (and related agencies), NZTA's Driver Check service, Housing New Zealand Corporation, Office of the Privacy Commissioner and the Commerce Commission;
- anyone else Avanti is required to share that information with in order to comply with any laws, rules or regulatory requirements;
- external dispute resolution schemes, for example, if you make a complaint about Avanti;
- any person who has a guaranteed or given security in connection with, or who otherwise has a financial interest in, the product or service they have provided to you;
- any third parties who provide services to Avanti, including their IT providers, providers of their mailhouse services, debt collection agencies, professional advisers, market research agencies and their own banks, and insurers;
- other members of the Avanti group of companies; and
- anyone to whom Avanti may transfer or assign their rights or obligations under their agreements with you (for example, on a merger, sale, financing or acquisition of the whole or a part of their business).

You authorise Avanti to request and collect your personal information from the third parties referred to above.

Avanti might collect and share your personal information with these third parties on an ongoing basis, for example, they may elect to receive notifications about changes to your driver's licence from NZTA's Driver Check service and they will continue to collect and share information with credit reporting



agencies while they continue to have a relationship with you. This might include lodging a default on your credit file. The credit reporter may keep that information and disclose it to its customers (which may include disclosing it to other lenders from whom you apply for finance in the future).

If Avanti requires information from you during the application process, and there is more than one applicant, they may share this information with the other applicants.

### **Storage And Retention of Your Personal Information**

Your personal information is stored electronically or in paper files. Generally, Avanti holds your personal information in New Zealand. Service providers (including cloud-based storage providers in New Zealand and overseas) may hold it on their behalf.

Avanti takes security measures to keep your personal information safe against unauthorised use, access and disclosure. This includes the use of passwords and other identity controls.

Avanti will only retain your personal information for as long as reasonably necessary to fulfil the purposes they collected it for, and as otherwise required for the purposes of satisfying their legal, regulatory, tax, accounting or reporting requirements, in the event of a complaint or if they reasonably believe there is a prospect of litigation in respect of their relationship with you.

### **Access And Correction**

You have the right to ask for a copy of any personal information Avanti holds about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact Avanti at by telephoning them on 0800 808 003, emailing them on [info@avantifinance.co.nz](mailto:info@avantifinance.co.nz) or writing to them at Avanti Finance Limited, 33 Broadway, Newmarket, Auckland 1023.

In some cases, Avanti does not have to give you access to certain information. If this is the case, they will tell you and they will explain why this is the case.

If they don't think the information is incorrect, they will advise you of this and explain why.

You can ask credit reporters for a copy of any credit information the credit reporter holds about you and to update it, if necessary.



### **Electronic Communications**

By providing Avanti with an email address, you consent to receive all communications from them in electronic form to that email address or any other email address specified by you.

### **Complaints About Avanti**

If you want to make a complaint about privacy, you can contact Avanti by calling them on 0800 808 003 or (09) 571 0720 or emailing them on [complaints@avanitfinance.co.nz](mailto:complaints@avanitfinance.co.nz). You can also make a complaint to the Office of the Privacy Commissioner. See [www.privacy.org.nz](http://www.privacy.org.nz) for more information.

## **PRIVACY POLICY – FINANCE NOW**

ACKNOWLEDGEMENT: to the creditor, Finance Now Limited, PO Box 1204, Invercargill 9840, New Zealand (“Finance Now”).

You are protected by responsible lending laws. Because of these protections, any recommendations given to you about your application is not regulated financial advice. This means that duties and requirements imposed on people who give financial advice do not apply to these recommendations. This includes a duty to comply with a code of conduct and a requirement to be licensed.

You acknowledge that in order to continue, you will need to provide Finance Now with certain personal information.

Finance Now’s Privacy Policy is available on their website. Finance Now can send you a link anytime if you want to review the policy before continuing.

You agree that Finance Now can collect personal information about you, from you and other sources outlined in their privacy policy which includes credit history and personal contact/identity details, so that Finance Now can interact and communicate with you. Capture and verification of identity information through Finance Now’s electronic process will include your ID document and your face, via your device camera.



Finance Now may also share your personal information with other organisations as outlined in Finance Now's privacy policy.

You do not have to provide your personal information to Finance Now but if you do not, Finance Now will not be able to assess your application. You can stop the electronic ID verification process at any time, but Finance Now will still need to verify your identity in another way if you want to proceed with your application. You can access and correct your personal information at any time.

Please let Finance Now know if you have any questions. For a Full Privacy Policy Disclosure please [click here](#).

**To apply for a loan, you authorise Finance Now to undertake a credit check, and you acknowledge and agree to these terms of the Privacy Policy.**

## PRIVACY STATEMENT - CFS FINANCE

Before proceeding with this application, please confirm:

- You consent to us using your information to:
  - Consider and process your loan application;
  - Verify your identity as required under anti-money laundering laws;
  - Complete a credit check which includes any MOJ (Ministry of Justice) fines;
  - Complete a personal property securities register search;
  - For work visa holders, complete a visa verification enquiry;
- You agree we may share your information with credit reporters who will hold it on their systems as part of their credit reporting services
- You acknowledge credit reporters may supply your information to their other customers
- You can access and correct your personal information at any time by contacting the CFS Customer Care team on 0800 882000, or via email to [customercare@cfsfinance.co.nz](mailto:customercare@cfsfinance.co.nz).

