

PRIORITY FINANCIAL SERVICES LIMITED

Privacy Statement

Last updated: 11 May 2026

1. Introduction

Priority Financial Services Limited ("Priority Financial Services", "we", "us", "our") respects your privacy and is committed to protecting your personal information. This Privacy Statement explains how we collect, use, store, disclose, and protect personal information about you in accordance with the Privacy Act 2020, the Health Information Privacy Code 2020, and other applicable New Zealand laws.

By providing your personal information to us, or by engaging us to provide financial advice or related services, you acknowledge that you have read and understood this Privacy Statement.

2. About us

Priority Financial Services Limited is a Financial Advice Provider (FAP) licensed by the Financial Markets Authority. We provide personal risk insurance advice and related services to clients in New Zealand. Further details about our business and our financial advice services are set out in our publicly available disclosure information at www.priorityfs.co.nz.

3. Our Privacy Officer

We have appointed a Privacy Officer in accordance with section 201 of the Privacy Act 2020. Our Privacy Officer is responsible for ensuring our compliance with the Act, dealing with requests for access to and correction of personal information, and handling privacy complaints.

Email: admin@priorityfs.co.nz

Phone: 03 343 2111

Postal address:

142 Lake Terrace Road | Christchurch 8061 | PO Box 1292, Christchurch 8140

4. The personal information we collect

The personal information we collect about you depends on the services we provide. It typically includes, but is not limited to:

- **Identity information:** full name, date of birth, gender, marital status, residential and postal address, country of birth, citizenship and residency status, and copies of identification documents (e.g. driver licence, passport).
- **Contact information:** Email address, phone numbers, and preferred method of contact.
- **Financial information:** Income, expenses, assets, liabilities, banking details, employment, and tax residency information.

- **Insurance and product information:** Details of existing insurance policies, claims history, and information about products you have applied for or hold.
- **Health information:** Medical history, current health status, lifestyle factors (such as smoking, alcohol use, recreational activities), and information from medical practitioners, hospitals, and laboratories. This is health information for the purposes of the Health Information Privacy Code 2020.
- **Family and dependant information:** Limited personal information about your spouse, partner, children, and other dependants, where this is relevant to the advice you have asked us to provide.
- **Customer due diligence information:** Information required under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, including source of funds and beneficial ownership.
- **Interaction information:** Records of meetings, emails, phone calls, file notes, statements of advice, and other correspondence we have with you.
- **Website and technical information:** When you use our website, we may collect information such as your IP address, device type, browser, pages visited, and similar technical data via cookies and analytics tools.

5. How we collect personal information

We collect personal information in a number of ways, including:

- directly from you, in person, by phone, by email, through electronic forms, fact-finds, applications, or written correspondence;
- from third parties such as insurers, reinsurers, underwriters, claims assessors, medical practitioners, laboratories, hospitals, government agencies, credit reporting agencies, identity verification providers, and AML/CFT verification services;
- from any person you have authorised to provide information to us (such as your accountant, lawyer, mortgage adviser, or family member);
- from publicly available sources; and
- through your interactions with our website, online tools, and email.

Where we collect personal information about you from someone other than you, we will, where it is reasonable and practicable to do so, take steps to ensure you are aware that we have collected the information and the matters referred to in Information Privacy Principle 3 of the Privacy Act 2020.

6. Health information

Because we provide insurance advice, we will often need to collect sensitive health information about you. This information is collected and handled in accordance with the Health Information Privacy Code 2020 ("HIPC"), which sits alongside the Privacy Act 2020 and contains additional rules for health information.

We will only collect health information that is necessary for us to provide the advice and services you have asked us for, or to enable an insurer to assess an application or a claim. We will normally collect this information from you directly, but with your written authority we may also collect it from your

medical practitioner, specialists, hospitals, laboratories, ACC, the Ministry of Health, or other health providers.

You are not required to provide health information to us. However, if you choose not to, we may be unable to provide advice or arrange the insurance cover you have asked for, and an insurer may decline to offer cover or pay a claim.

7. Why we collect, use and disclose your personal information

We collect, hold, use, and disclose personal information for purposes connected with our business, including to:

- provide you with financial advice and related services;
- verify your identity and meet our customer due diligence and ongoing monitoring obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009;
- assess your needs and circumstances and prepare a Statement of Advice or other recommendations;
- arrange, place, vary, renew, or cancel insurance cover or other financial products on your behalf;
- liaise with insurers, reinsurers, underwriters, and claims assessors in relation to applications, underwriting, and claims;
- manage and administer your ongoing relationship with us and any product providers;
- comply with our legal, regulatory, and licence obligations, including under the Financial Markets Conduct Act 2013, the Financial Services Legislation Amendment Act 2019, and the Code of Professional Conduct for Financial Advice Services;
- keep records as required by law and our regulators;
- train our staff, monitor service quality, and improve our services;
- respond to your enquiries, complaints, and feedback; and
- with your consent, send you newsletters, updates, and marketing about our services and other products that may be of interest to you.

8. Who we may share your personal information with

We may disclose your personal information to:

- insurers, reinsurers, underwriters, and their agents, for the purposes of obtaining quotes, placing cover, varying cover, and managing claims;
- product providers and product issuers whose products you hold or are considering;
- medical practitioners, hospitals, laboratories, and other health professionals where necessary for underwriting or claims (with your authority);
- our staff, contractors, and authorised body advisers operating under our FAP licence;
- our service providers, including IT and cloud hosting providers, customer relationship management (CRM) providers, document storage providers, identity verification and AML/CFT screening providers, and professional advisers (such as our lawyers, accountants, auditors, and compliance consultants);

- industry bodies and dispute resolution schemes (including our external disputes resolution scheme) where relevant;
- the Financial Markets Authority, the Reserve Bank of New Zealand, the Inland Revenue Department, the New Zealand Police, the Department of Internal Affairs, the Office of the Privacy Commissioner, and other regulators or government agencies where we are required or authorised by law to do so;
- any person to whom we are required or authorised by law (or by court order) to disclose personal information; and
- any other person where you have given us your consent.

9. Sending information overseas

Some of the third parties we use, including some insurers, reinsurers, underwriters, technology providers, and cloud hosting providers, are located outside New Zealand or store information on servers located outside New Zealand. The countries to which your personal information may be sent include Australia, the United States, the United Kingdom, the European Union, and other jurisdictions in which our service providers operate.

Before disclosing personal information to a person or entity outside New Zealand we comply with Information Privacy Principle 12 of the Privacy Act 2020. In practice this means we will only do so where:

- the recipient is carrying on business in New Zealand and is therefore subject to the Privacy Act 2020;
- the recipient is in a country with privacy laws that provide comparable safeguards to the Privacy Act 2020 (for example, jurisdictions prescribed by regulations made under the Act);
- the recipient has agreed (typically by contract) to protect the information in a way that provides comparable safeguards to those in the Privacy Act 2020; or
- you have expressly authorised the disclosure after being informed that the recipient may not be required to protect the information in a way that provides comparable safeguards to the Privacy Act 2020.

If you would like more information about the overseas recipients of your personal information and the safeguards we have in place, please contact our Privacy Officer (see section 3).

10. How we store and protect your personal information

We hold personal information in a combination of secure physical files and secure electronic systems, including cloud-based systems operated by reputable third-party providers on our behalf.

We take reasonable security safeguards to protect personal information against loss, unauthorised access, use, modification, disclosure, or other misuse. These include access controls, password protection, encryption in transit, secure backups, role-based access permissions, staff confidentiality obligations, training, and contractual protections with our service providers.

No system or transmission of information over the internet is completely secure. While we work hard to protect your personal information, we cannot guarantee the security of any information you transmit to us electronically, and you do so at your own risk.

In the event of a notifiable privacy breach (as defined in the Privacy Act 2020) we will notify the Office of the Privacy Commissioner and any affected individuals as soon as practicable.

11. How long we keep your personal information

We will keep your personal information only for as long as it is required for the purposes for which it was collected, or for as long as we are required to retain it under New Zealand law.

In particular, we are required to retain records relating to financial advice for at least seven years under the Financial Markets Conduct Act 2013 and Financial Markets Conduct Regulations 2014, and customer due diligence records for at least seven years under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009. In some cases we may retain records for longer where this is necessary, for example for the management of long-tail claims, complaints, or litigation.

When personal information is no longer needed and we are no longer required to retain it, we will securely delete or de-identify it.

12. Your rights to access and correct your personal information

Under the Privacy Act 2020 you have the right to:

- request confirmation of whether we hold personal information about you;
- request access to the personal information we hold about you; and
- request the correction of personal information we hold about you that you believe is inaccurate, incomplete, misleading, or out of date.

To make a request, please contact our Privacy Officer (see section 3). We may need to verify your identity before responding. We will respond to your request as soon as reasonably practicable, and in any event within 20 working days, in accordance with the Privacy Act 2020. There is no charge for making a request, although we may charge a reasonable fee in limited circumstances permitted by the Act (for example, where a request requires substantial collation or research).

If we decline a request, we will tell you the reason and notify you of your right to complain to the Office of the Privacy Commissioner.

13. Marketing communications

From time to time we may send you marketing communications, such as newsletters, product updates, and information about events, by email, text message, or post. We will only do so where we are permitted to under the Unsolicited Electronic Messages Act 2007, including where you have consented or where the law permits us to send you such communications without consent.

Every electronic marketing message we send will contain a clear unsubscribe option. You can also opt out of marketing communications at any time by contacting our Privacy Officer. Opting out of marketing communications will not affect the service-related communications we need to send you (for example, communications about your existing policies or claims).

14. Cookies and our website

Our website may use cookies and similar technologies to collect technical information about how visitors interact with the site, such as pages viewed, time spent on the site, and referring URLs. We use this information to improve the performance, functionality, and user experience of the site and, where applicable, for analytics and to measure the effectiveness of our communications.

Most browsers allow you to control cookies through your browser settings. If you choose to disable cookies, some features of our website may not function correctly.

15. Children's personal information

Our services are not directed to children. We will only collect personal information about a child where it is necessary for the financial advice or insurance product being arranged for the child or their parent or guardian, and where this is provided by a parent, guardian, or other person authorised to provide it.

16. Complaints

If you have any concerns or complaints about how we have handled your personal information, please contact our Privacy Officer in the first instance (see section 3). We will acknowledge your complaint promptly and investigate it as quickly as we reasonably can.

If you are not satisfied with our response, you have the right to complain to the Office of the Privacy Commissioner. The Privacy Commissioner can be contacted at www.privacy.org.nz, by phone on 0800 803 909, or by email at enquiries@privacy.org.nz.

Complaints about our financial advice services more generally are handled in accordance with our internal complaints process, details of which are set out in our publicly available disclosure information. If your complaint is not resolved internally, you may refer it to our external dispute resolution scheme, [insert name of DSR scheme].

17. Changes to this Privacy Statement

We may update this Privacy Statement from time to time to reflect changes in our business, our services, or the law. The current version will always be available on our website at www.priorityfs.co.nz. The date this Privacy Statement was last updated is shown at the top of the document. We encourage you to review this Privacy Statement periodically.

18. Contact us

If you have any questions about this Privacy Statement or how we handle your personal information, please contact our Privacy Officer using the details set out in section 3.

This Privacy Statement should be read together with our disclosure information and any client engagement terms we have agreed with you.