

The logo for wbs loans & investments, featuring the lowercase letters 'wbs' in a white, sans-serif font on a blue background. Below the letters, the words 'loans & investments' are written in a smaller, white, sans-serif font. The blue background is a banner-like shape that tapers at the bottom.

wbs  
loans & investments

A photograph of a middle-aged man with glasses and a blue denim shirt. He is holding a black smartphone to his ear with his right hand and has his left hand on a laptop keyboard. The background is a warm, wooden interior with a window letting in bright light. The text 'Privacy Policy' is overlaid in white at the bottom of the image.

# Privacy Policy

# Introduction

Wairarapa Building Society, of 125 Queen Street, Masterton, recognises the importance of protecting your privacy. When dealing with personal information, we comply with the Privacy Act 2020.

Personal information is information about an identifiable individual (a natural person) and includes biometric information (as defined below). In our situation, identifiable individuals are likely to be our clients, potential clients and visitors to our website.

This Policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see [www.privacy.org.nz](http://www.privacy.org.nz).

## Definitions

**Act** means the Privacy Act 2020

**Biometric information** refers to a person's unique physical or behavioral characteristics such as facial features or the way a person moves (for example, smiles) or a combination of both

**Cookies** are small pieces of information which can be stored on your computer's hard drive or memory. They allow us to track and target the interests of our website users

**Policy** means the privacy policy as set out in this document

**Related organisation** means all organisations under the control of Wairarapa Building Society

**WBS** means Wairarapa Building Society and any related organisations, also referred to as 'we', 'us', and 'our'.

**Website** means our website, [www.wbs.net.nz](http://www.wbs.net.nz), and any of our online tools

## Scope of Policy

This Policy sets out how we will collect, use, disclose and protect your personal or biometric information.

This Policy may continue to apply to you and your information even after your relationship with us has come to an end. The Policy also applies to any information collected during your use of our website, even if you do not open an account with us.

You agree that your use of our website, or any account, product or service provided by us, indicates acceptance of this Policy and you authorise us to collect, use and share your personal information as outlined in this Policy.

# Why do we collect and use personal information about you?

WBS will only collect personal information that is connected to a function or activity we carry out, and only where the collection of that information is necessary for that function or activity. WBS collects information about you for the purposes listed below.

WBS is required to collect personal information about you to meet New Zealand and overseas legal obligations (such as protecting your money, and assisting in preventing fraud and money laundering). It is important we keep our information about you up to date. Please tell us as soon as possible if your contact details or other information you have given us has changed.

## What personal information do we collect?

The types of information we may collect about you can include:

- **Identity information:** including [first name, last name, marital status, title, date of birth and gender]
- **Contact information:** including [billing address, delivery address, email address and telephone numbers]
- **Financial information:** including [bank account and payment card details]
- **Transaction information:** including [details about payments to and from you and other details of services and products you have purchased from us]
- **Profile information:** including [your client ID and password, your interests, preferences, feedback and survey responses]
- **Marketing and communications information:** including [your preferences in receiving marketing from us and your communication preferences]
- **Biometric information:** including [your photo and a video of your face]
- **Technical information:** including [internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website]
- **Usage information:** including [information about how you use our website, products and services]

## What happens if you don't give us your personal information?

If you do not provide personal information that we have requested, you may not be able to obtain or access the accounts, products or services for which the personal information is required.

## Who do we collect your personal information from?

We collect personal information about you from:

- you, when you provide that personal information to us, including via the website and any related account and service, through any registration or subscription process, via any biometric identity check, through any contact with us (such as telephone call, email or postal), when you apply for an account, product or service, and during our relationship with you
- third parties (only when you have authorised this or the information is publicly available).

We may also make enquiries with others to verify the information you give us. Where possible, we will collect personal information from you directly.

## Collection of information through our website

To develop our website and our marketing, we may collect information gathered from web analytics tools. This may include patterns of traffic to, from, and within our website, your activity on our website, your IP address and other information that you voluntarily enter into our website.

To develop our marketing, our website may use third party cookies from Google Analytics (and other website statistics software). This gives us information relating to the age, gender and interests of those visiting our website on an anonymous and collective basis, as well as the number of people who have viewed our marketing on other websites. This helps us to better understand internet conduct to give you a better experience while visiting our website, and to enhance our marketing.

# Cookies

We may use cookies when you are on our website. These cannot read your hard drive, take control of any part of your computer, or instigate an action within your computer. We collect information through cookies and may share this information with third parties. Any information collected in this manner is on an anonymous and collective basis (it does not include personal information which is likely to identify you). The information may be used:

- for security purposes (to protect your money)
- to offer you tailored features
- to understand traffic patterns on our website
- to market our products and services on our website and third-party websites.

You can prevent cookies from being installed on your computer. You can delete existing cookies. For information on how to do this, please check your internet browser. If you refuse to accept our cookies, you may be unable to log in to our secure services.

# Biometric processing

We also undertake biometric processing, as defined in the Biometric Processing Privacy Code 2025 (BPPC), by collecting and processing your biometric information for the purpose of verifying your identity. We may also do this to comply with our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML).

Biometric processing to verify your identity is optional. If you do not agree to us carrying out biometric processing, you can visit us in person or provide us with verified or certified identity documentation instead. Your options will be explained during the onboarding process. If you have any concerns or complaints about WBS's biometric processing, including the handling of your biometric information, you can email us at [complaints@wbs.net.nz](mailto:complaints@wbs.net.nz) or visit our website to view our complaints procedure.

You also have the right to complain to the Privacy Commissioner about any action that the BPPC relates to. For more information, you can visit their website at [www.privacy.org.nz](http://www.privacy.org.nz).

# Our purposes for collection and use of personal information

We will collect and use your personal or biometric information legally and fairly, and for the following purposes.

- To obtain or verify your identity
- To open and operate your accounts
- To provide accounts, services and products to you, and managing your relationship with us
- To market our accounts, services and products to you, including contacting you electronically if we have your consent (such as by phone, email or postal mail for this purpose)
- To improve the accounts, services and products that we provide to you
- To undertake credit checks of you (if necessary, and with your authority)
- To bill you and to collect money that you owe us
- To respond to communications from you, including a complaint
- To conduct research and statistical analysis (on an anonymised basis)
- To protect and/or enforce our legal rights and interests, including defending any claim
- For any other purpose authorised by you or the Privacy Act
- To comply with any laws in New Zealand or overseas applying to us or the accounts, products or services we provide you. For example, we are required to collect certain information under AML, and to meet our obligations under the Tax Administration Act 1994 in relation to the United States Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS)

Occasionally, we may need to use your personal information for another purpose (usually associated with a particular product or service). We will do so in accordance with the Privacy Act.

## Protecting your personal information

We take your privacy seriously and understand the need to keep your information confidential and secure. We update our technology regularly, and contract IT specialists to manage our technology services. We undertake regular external and internal audits of these services to help protect your information. We take the issue of fraud seriously and this Policy outlines the steps we take to secure any information we have about you or your accounts.

We (or third parties contracted to do so) can store your information physically or electronically. We will act reasonably to ensure that your information is protected from unauthorised use or disclosure.

## What do we do if there is a privacy breach?

If we believe there has been a privacy breach, we will identify the issue and take steps to minimise any harm.

If we believe the breach has caused serious harm, or is likely to do so, and is a notifiable breach under the Privacy Act, we will comply with our obligations

under the Act to notify the Officer of the Privacy Commissioner and affected individuals, as soon as possible in accordance with the Act. We may also notify you of a serious breach as soon as practicable in accordance with the Act.

## Accessing and correcting your personal information

You have the right to request access your personal information. You also have the right to request correction of any of your personal information.

You can access or correct your personal information by calling 06 370 0070, emailing [wbs@wbs.net.nz](mailto:wbs@wbs.net.nz) or calling into our branch at 125 Queen Street, Masterton.

The Privacy Act allows us to charge you a reasonable fee to access the information we have about you, which we will tell you about when you make a request.

WBS has an ongoing legal obligation to ensure your personal details are up to date and correct. This is often dependent on you informing us about any changes to the information, however we may check with you periodically.

We will take reasonable steps to ensure that your personal information is correct before we use it (for example, under anti-money laundering legislation we are required to verify or certify personal documents before use).

## Disclosing your personal information

You agree we may disclose your personal or biometric information to:

- any business that supports our accounts, services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the database, website, disaster recovery services or other services and products
  - A business that supports our accounts, services and products may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand, and those businesses may be subject to overseas legislation which may require them to disclose your information in certain circumstances
  - WBS will only disclose your personal information to a business outside New Zealand where:
    - (i) we believe, on reasonable grounds, that the entity receiving the information is either subject to the Privacy Act or is subject to privacy laws that provide comparable safeguards to the Act
    - (ii) where (i) does not apply, if you expressly authorise such disclosure.
- a credit reference agency for the purpose of credit checking you
- debt collection agencies

- agencies engaged by us to verify customer identity or address information
- organisations conducting market research, data processing and statistical analysis for us
- guarantors of your obligations to us
- our or your insurers in relation to money you owe us, or property you give us security over
- our assignees or potential assignees
- your previous or current employer(s) to confirm your employment history or income
- anyone that we need to contact to carry out your instructions to us (including the recipient of any payment)
- any person who requires us to supply your personal information (such as a regulatory authority)
- any other person authorised by the Act or another law who requires your personal information (such as a law enforcement agency)
- anyone that we need to, in order to comply with laws in New Zealand or laws outside New Zealand that apply to us or the accounts, products or services we provide you
- any other person authorised by you.

## Customer checks we may do

We may occasionally use credit reference agencies to check your financial status when you are applying for accounts, products or services with us, or to monitor your credit status while you owe us money. This means we may give your information to those agencies. We may also inform them if you have or have not met any payment obligations you may have to us.

You authorise us to collect information about you, and make enquiries we think appropriate, in order to:

- confirm information provided to us about you is true
- undertake due diligence monitoring according to AML, and to meet our obligations under the Tax Administration Act 1994 in relation to the United States Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS)
- enforce debt (including recovery of money owed to us)
- comply with other legal obligations we may have.

To comply with our AML requirements, we use third-party services (service providers) to verify your identity and conduct other due diligence or monitoring required under AML, and for credit checking. Our service providers may:

- be provided with your contact details and any documentation required for AML purposes
- provide us with AML related information about you and to us holding that information as long as required by law.

## Electronic data exchange

We take reasonable steps to maintain secure internet connections. However, if you provide us with personal information electronically (including but not limited to, by email, through our website, social media and internet banking) the provision of that information is at your own risk.

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

Ensure you read our Website Terms and Conditions. These can be viewed at [www.wbs.net.nz/index.php/terms-and-conditions](http://www.wbs.net.nz/index.php/terms-and-conditions). By accessing our website, you indicate that you have read and agreed to our Website Terms and Conditions. When using our website, you must observe these Terms and Conditions at all times.

## Changes to this Policy

Technology is constantly evolving, and we may at any time change this Policy. It is important that you review this Policy regularly. If possible, we will advise you of what changes we are making, and when the change will take effect in one of the following ways.

- We may write to you, send you an email, or call you by phone to explain any changes
- We may display information about changes in our branch or put it on our website
- We may advertise any changes, for example in newspapers, or on radio or television

## What happens to your personal information when you no longer use our services?

After you cease to be a client, we will no longer use your personal information unless authorised to by you, or as required by law.

## How long do we keep your information?

WBS is required to retain personal information (including biometric information) for as long as it is required to comply with our regulatory and legal obligations under New Zealand and international laws.

We usually hold personal information for at least 7 years. However, we must keep certain types of information for longer, even if you are no longer a client. Under the Act, we can only keep personal information for as long as is required for the purposes for which the information may be lawfully used.

In relation to biometric information, we usually delete this immediately if our relationship with you does not proceed. Otherwise, we will keep this for at least 5 years after our relationship with you has ended, or longer where required by law (such as, under AML).