

WBS PRIVACY POLICY

INTRODUCTION

Wairarapa Building Society recognises the importance of protecting your privacy. When dealing with personal information we comply with the Privacy Act 1993.

Personal information is information about an identifiable individual (a natural person). In our situation, identifiable individuals are likely to be our clients, potential clients and visitors to our website/s.

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.

DEFINITIONS

Act means the Privacy Act 1993.

Cookies are small pieces of information which can be stored on your 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 below.

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) and any of our online tools.

SCOPE OF POLICY

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

This Policy may continue to apply to you and your information even after your relationship with us has come to an end. This 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 in (9) below.

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

CONSEQUENCES OF NOT PROVIDING 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, through any contact with us (e.g. 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 provide to 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 whilst 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, or 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; for understanding traffic patterns on our Website; and for marketing of 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.

OUR PURPOSES FOR COLLECTION AND USE OF PERSONAL INFORMATION

We will collect and use your personal information legally and fairly, and for the following purposes:

- To obtain and/or verify your identity;
- Opening and operating 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 (e.g. 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 Act;
- To comply with any laws in New Zealand or overseas applying to us or the accounts, products or services we provide you.

Occasionally, we may need to use your information for another purpose (usually associated with a particular product or service). If so, and in accordance with the Act, we will take reasonable steps to make you aware of that purpose.

We will only use the information for these purposes.

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. Fraud is also taken seriously and this Policy outlines steps to keep information about you or your accounts with us secure.

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.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You have the right to access your personal information. You have the right to correct any personal information that is wrong.

You can access or correct your personal information by calling 06 370-0070, emailing wbs@wbs.net.nz or calling into our branch at 75 Queen Street, Masterton.

The Act allows us to charge you a fee to access the information we have about you.

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/certify personal documents before use).

DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal 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;
- A credit reference agency for the purpose of credit checking you;
- Debt collection agencies;
- Agencies engaged by us to verify customer identify or address information;
- Organisations conducting market research, data processing and statistical analysis for us;
- Guarantors of your obligations to us;
- Our/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);
- Upon receipt of a request by a person who can require us to supply your personal information (e.g. a regulatory authority);
- Upon receipt of a request by any other person authorised by the Act or another law (e.g. a law enforcement agency);
- Any other person authorised by you.

CREDIT CHECKS

We may occasionally use credit reference agencies to check your financial status when you are applying for accounts, products or services with us, and/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 haven't met any payment obligations you may have to us.

INTERNET USE

We take reasonable steps to maintain secure internet connections. However if you provide us with personal information over the internet, 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.

Our Website Terms and Conditions should be read. These can be viewed at www.wbs.net.nz/index.php/terms-and-conditions. By accessing our Website, you indicate that you have read and have agreed to our Website Terms and Conditions.

It is a condition of your use of our Website that you observe the 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 required to by law.