

Simplify is committed to protecting the privacy of the information we hold about each of our customers, including your personal information and credit related information. We will comply with the New Zealand Privacy Act 2020, that governs how we collect, use, hold and disclose your personal information, and how we ensure it is accurate and secure.

The information you have or may provide during the process in connection with your application is being collected by Simplify Holdings NZ Limited (NZBN 9429047345119/Registered Company Number 7341879), Simplify Holdings International Pty Ltd (FSP455126/ACN 605 951 068) or one of its related bodies, corporate partners or franchisees (Simplify, we, our, us).

## Consent

Please note that when you contact us by phone or through our digital platforms, you are agreeing to our privacy policy, including but not limited to our website, online application and social media. Should you wish to obtain further information about your privacy before using these services please contact us on 0800 001 561.

By accessing and using our services, you accept and agree to be bound by the terms and provision of this policy. Any participation in our services will constitute acceptance of this policy. If you do not agree to abide by this policy, please do not use our service.

## What is personal and credit related information?

Personal information is any information or opinion about you, that identifies you or from which you can be reasonably identified. "Personal Information" as defined in the New Zealand Privacy Act 2020 ("the Privacy Act"), means all information about an identifiable individual (a natural person, rather than a company or other legal entity). Credit related information includes identification information as well as information about your current financial and credit situation, and history.

## Information collected

We have a legal obligation to ensure any credit services we assist you with are not deemed unsuitable for you. As a Simplify customer, we will collect your personal information from you in order to allow us to provide services to you, which includes assisting you to obtain credit suitable for your purposes and to meet your objectives, through our panel of lenders and to provide you with information about other services we consider appropriate.

The information we collect may include your first name, last name, mobile number, address, email address, date of birth, drivers licence and address as evidence of your identity, New Zealand residency status, relationship status, employment details, credit history and financial details like income, assets, household liabilities and assets.

This will allow us to:

- Make reasonable enquiries about your borrowing needs and objectives
- Make reasonable enquiries about your financial circumstances and;
- Take reasonable steps to verify the details of your financial situation and identify.

Any personal information will be collected directly from you, unless you have authorised us to collect that information from another party (for example, a credit reporting agency).

When we collect personal information from you, we will make clear the ways in which we may use or disclose that information, and will ask for your authorisation to do so. You do not have to provide us with information we request, however it may affect the services we can provide to you, if you do not.

## How we protect and store your information

We may electronically record and store your personal information which we collect from you. This may include engaging a third party to provide services relating to the security and storage of that information, such as third party cloud service providers to store and process the information we collect.

We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

We will take all practicable steps to safeguard your personal information and prevent unauthorised disclosure. You should notify us immediately if you feel your personal information has been compromised in any way, to assist us in preventing unauthorised disclosure. We will not continue to store personal information when it is no longer required for any of the purposes for which it may be used.

## Use of information

We have controls in place to ensure that your personal information will be used only for the purposes for which it was collected and purposes which you have authorised.

Generally, these purposes will be:

- to consider providing you with credit or other services;
- to administer and develop our business (and that of our Lenders/Insurers), including administering and monitoring any agreement with you;
- to register security interests;
- to comply with laws, rules or regulations (including identity verification requirements, Anti Money Laundering/Counter Financing of Terrorism compliance and audit and reporting requirements, in New Zealand or overseas, including any laws, rules or regulations that we reasonably expect to be put in place);
- for direct marketing purposes;
- to assess your creditworthiness;
- to exercise our rights and fulfill our obligations under any agreements with you or at law; and
- generally to do business with you, including to defend or enforce our rights.

Unless you inform us that you do not wish to be contacted by us, we may use your personal information to contact you, including by mail, email and telephone (including SMS) to provide you with information about and discuss other products or services provided by selected third parties (lenders and Insurers) in which we think you may have an interest. We will not use or act on any of your personal information without taking reasonable steps (having regard to the purpose for which the information will be used) to ensure that the information is accurate, up to date, complete, relevant, and otherwise not misleading.

If we believe that your information is inaccurate, not up to date, incomplete, irrelevant or otherwise misleading, we will ask you (or, with your consent, another person or organisation) to verify that information before we use it.

## Disclosure of information

As a Simplify customer, you consent to your personal information being disclosed to or obtained from other organisations or people we consider appropriate for the purposes listed above.

Those other organisations or people include:

- our related companies;
- our service providers;
- other financial or insurance institutions;

- government departments, government bodies or agencies in New Zealand or overseas (including tax authorities);
- the New Zealand Transport Agency's 'Driver Check' service;
- any organisation or person providing us with guarantees or security under any agreement with you;
- our existing and potential business partners;
- any organisation or person to whom we consider assigning or transferring any of our rights under any agreement with you;
- your employer and accountant; and
- any other organisation or person you authorise your personal information to be disclosed to or obtained from.

In particular, we may use the services of credit reporting agencies on an on-going basis, and may exchange information about you with those agencies (including information about your default and repayment history). Those agencies may retain that information and provide that information to other customers who use their credit reporting services.

We may also disclose your information where that disclosure is permitted under the New Zealand Privacy Act 2020, such as where the disclosure:

- is necessary to facilitate a sale of all or part of a Lenders business; or
- is necessary to prevent a serious or imminent threat to public health or safety;
- is authorised by the Privacy Commissioner;
- is of information which is already publicly available; or
- is of information which is not in a form which identifies you.

The lenders and insurers with whom we may share your information are listed below. To view their privacy policy and information statements, please click on the lender/insurer below:

#### Lender

[Avanti Finance Limited](#)  
[Branded Financial Services \(NZ\) Limited](#)  
[Financial Holdings Limited](#)  
[Geneva Finance Limited](#)  
[Finance Now Limited](#)  
[Heartland Bank](#)  
[Oxford Finance Limited](#)

#### Insurer

[Cove Limited](#)  
[Autosure/DPL Insurance Limited](#)

## Accessing, updating and correcting your information

You have the right to access and request correction of any personal information that we hold about you, and full details of every organisation or person to whom we have disclosed information about you, by contacting Simplify on 0800 001 561.

There are some circumstances in which we are not required to provide your access to your personal information. If we disagree that your information should be corrected, deleted or you are refused access, we will tell you why in writing, except where the law permits us from doing so.

There is no fee for correcting your personal information. In processing your request for access to personal information, a reasonable cost may be charged. This would cover locating, obtaining and supplying the information to you including any fees charged by the lender.

## Cookies

Our web service collects the domain names, not the email addresses of visitors. Our web server may require an individual to place a "cookie" (small data file) on a user's computer's hard drive, in order to track statistical information about navigation to and throughout certain areas of our website.

## Third Party Websites

Through our website and social media pages, you may be able to link to other websites which are not under our control. We do not take any responsibility for the privacy or security practices of those third party websites. We do not accept any liability for any loss suffered by you relying on anything contained or not contained within these website links.

## Sending your information overseas

We operate our business both locally in New Zealand and within Australia. Whilst we operate on and offshore, this does not change our commitment to you to safeguard your privacy and your information remains subject to confidentiality obligations.

## Other things you should know

We may monitor and retain recordings of any telephone calls with you, including for quality assurance, training purposes, to make sure we comply with our regulatory obligations and to help detect or prevent fraud or other crimes.

We can change this privacy statement from time to time at our sole discretion. We will give notice of any changes directly or indirectly by means of an electronic message, through our websites or mobile apps, through the internet, through the media, or otherwise as we see fit and permitted by applicable law.

If a lender accepts your application, we will highlight the key features of the loan agreement with you, including all fees and charges. This will also detail things like the amount you're borrowing, the time frame for repayment and how often you make repayments. It also includes information about what might happen if you don't make repayments. If you have any questions about the key features of the loan agreement at any time, don't understand any of the key features or if you think any of the key features might not be right for you, it is important that you call us before you sign your loan agreement.

A copy of the fees that Simplify may charge you in relation to assisting you obtain finance can be viewed on our website found here [Fees and Charges](#).

## Queries, Concerns or Complaints

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Privacy Act you can contact our Privacy Officer in these ways:

Telephone: 0800 001 561

Email: [team@simplify.co.nz](mailto:team@simplify.co.nz)

In writing to: Unit 14/6 Waima Street, Avondale, Auckland, 1021, New Zealand

- We will acknowledge your complaint within two business days of its receipt
- We will let you know if we need any further information from you to investigate your complaint
- We aim to resolve complaints as quickly and efficiently as possible
- We will strive to resolve complaints within five business days, but in some cases where we need to obtain further detail, this may take a little longer to resolve.

If you are not satisfied with the way we have handled your complaint, you may complain to the Office of the Privacy Commissioner in these ways:

Lodge a complaint on the Privacy Officer website: [www.privacy.org.nz](http://www.privacy.org.nz)

Telephone: 0800 803 909

Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)