

## OUR PRIVACY STATEMENT

At Cole Murray Group Limited (trading as CM Financial Advisers) we are committed to protecting your privacy in accordance with the Privacy Act 2020 (Privacy Act) and the Information Privacy Principles (IPPs).

This Privacy Statement applies to personal information collected by us and explains how we collect, use, disclose and handle it as well as your rights to access and correct your personal information and how to make a complaint for any breach of the IPP's.

### The 13 Information Privacy Principles (as of May 2026)

- **IPP 1 – Purpose:** Only collect personal information if necessary for a lawful purpose.
- **IPP 2 – Source:** Collect information directly from the person concerned.
- **IPP 3 – Collection:** Inform the person why you are collecting their information.
- **IPP 3A – Indirect Collection (New):** Effective May 1, 2026, this rule requires notifying individuals when their information is collected from a third party.
- **IPP 4 – Manner:** Do not collect information in an unlawful or unfair way.
- **IPP 5 – Storage/Security:** Ensure information is kept secure and safe.
- **IPP 6 – Access:** Individuals have the right to access their personal information.
- **IPP 7 – Correction:** Individuals can request correction of their personal information.
- **IPP 8 – Accuracy:** Ensure information is accurate and up-to-date before using it.
- **IPP 9 – Retention:** Do not keep information longer than necessary.
- **IPP 10 – Use:** Use information only for the purpose it was collected.
- **IPP 11 – Disclosure:** Do not disclose information unless for a permitted purpose.
- **IPP 12 – Overseas Transfers:** Regulates sending personal information outside NZ, requiring comparable safeguards.
- **IPP 13 – Unique Identifiers:** Only use unique identifiers (like IRD numbers) when necessary.

## What is Personal Information?

The Privacy Act defines personal information to mean:

“Information about an identifiable individual; and includes information relating to a death that is maintained by the Registrar-General pursuant to the Births, Deaths, Marriages, and Relationships Registration Act 1995, or any former Act (as defined by the Births, Deaths, Marriages, and Relationships Registration Act 1995)”

## What is sensitive information?

Whilst not specifically defined within the legislation, in our view we consider the following types of information to be more sensitive in nature. Information or opinion about an individual’s racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information or templates.

## What kinds of personal information do we collect and hold?

The kinds of personal information we collect, and hold vary depending on the services our Financial Advisers are providing, but generally can include:

- Your contact information such as full name (first and last), e-mail address, current postal address, delivery address (if different to postal address) and phone numbers;
- Details relating to your employment (if applicable) or your previous employment;
- Your date of birth
- Insurance history;
- Other information specific to our products or services such as your opinions, statements and endorsements collected personally or via surveys and questionnaires, including but not limited to your views on the products and services offered by CM Financial Advisers;
- If you are requesting products or services from us, we will collect any relevant payment or billing information, (including but not limited to bank account details, direct debit, credit card details, billing address, premium funding and instalment information.

The type of sensitive information we may collect generally includes:

- criminal record;
- health information;
- membership of a professional or trade association;
- Your financial position

## HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?

We only collect personal information by lawful and fair means and where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

Unless it is unreasonable or impracticable for us to do so, or as provided otherwise under this Privacy Statement, we will collect your information directly from you or your agents. We collect the personal information we need to provide you with financial advice and to meet our legal obligations. Most of this information is provided directly by you.

In some cases, we may also collect personal information about you from third parties, such as product providers, public records, or other advisers involved in your financial affairs, from another insured if they arrange a policy which also covers you, related bodies corporate, referrals, your previous insurers or insurance intermediaries, witnesses in relation to claims, health care workers, publicly available sources, premium funders and persons. When this happens, the Privacy Act 2020 requires us to take reasonable steps to inform you, as soon as reasonably practicable, about what information has been collected, why we need it, how it will be used, and who it may be shared with.

We only collect information that is necessary for providing advice or meeting our regulatory requirements.

You can request access or correct your personal information at any time by contacting us.

For further information about how personal information is handled and the types of third parties involved, please refer to the Link Financial Groups Privacy Statement.

*We attempt to limit the collection and use of more sensitive information from you unless we are required to do so to carry out the services provided to you. However, we do not collect more personal information without your consent.*

We hold the personal information we collect within our own data storage devices or with a third-party provider of data storage. We discuss the security of your personal information below.

## The purposes for which we collect, hold, use and disclose your personal information:

We collect, hold, use and disclose your personal information where it is reasonably necessary for, or directly related to, one or more of our functions or activities. These will usually include our insurance broking services, insurance intermediary services, funding services, claim management services and risk management and other consulting services and meeting any obligations we have by law. We also use it for direct marketing purposes explained in more detail below.

For example, we usually need to collect, hold, use and disclose personal information where:

- We are providing you with advice, so we can provide this advice to you;
- we arrange insurance, so insurer(s) can decide whether to offer insurance or not;
- you require premium funding, so the funder can decide whether to provide the funding or not;
- a claim is made, so the insurer can make decisions on the claim;

We do not use or disclose personal information for any purpose that is unrelated to our services and that you would not reasonably expect (except with your consent). We will only use your personal information for the primary purposes for which it was collected or as consented to.

We usually disclose personal information to third parties who assist us or are involved in the provision of our services, and your personal information is disclosed to them only in connection with the services we provide to you or with your consent.

The third parties can include our related companies, our agents or contractors, insurers, their agents, regulators such as FMA and others they rely on to provide their services and products (e.g. reinsurers), premium funders, other insurance intermediaries, insurance reference bureaus, loss adjusters or assessors, medical service providers, credit agencies, lawyers and accountants, prospective purchasers of our business and our alliance and other business partners.

These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them, and we take such steps as are reasonable to ensure that they are aware of the provisions of this Privacy Statement in relation to your personal information.

We also use personal information to develop, identify and offer products and services that may interest you, conduct market or customer satisfaction research. From time to time, we may seek to develop arrangements with other organisations that may be of benefit to you in relation to promotion, administration and use of our respective products and services.

We do not use more sensitive information to send you direct marketing communications without your express consent. If we do propose disclosing or using your personal information other than for the purposes listed above, we will first seek your consent prior to such disclosure or use. If we give third parties (including their agents, employees, and contractors) your personal information, we require them to only use it for the purposes we agreed to.

## What if you do not provide some personal information to us?

If the required personal information is not provided, we or any involved third parties may not be able to provide appropriate services or products. If you do not provide the required personal information, we will explain what the impact will be.

## What do we expect of you/third parties we deal with when providing personal information about another person?

When you provide us with personal information about other individuals, we rely on you to make them aware that you will or may provide their information to us, how we collect, use, disclose and handle it in accordance with this Privacy Statement.

If it is sensitive information, we rely on you to have obtained their consent to the above. If you have not done these things, you must tell us before you provide us with the relevant information.

If we give you personal information, you must only use it for the purposes we agreed to.

Unless an exemption applies or we agree otherwise, you must meet the requirements of the Privacy Act when collecting, using, disclosing and handling personal information on our behalf.

You must also ensure that your agents, employees and contractors meet the above requirements.

## How do we manage the security of your personal information?

We take reasonable steps to ensure that your personal information is safe. We retain personal information electronically with us or our appointed data storage provider(s). You will appreciate, however, that we cannot guarantee the security of all transmissions of personal information, especially where the internet is involved.

Notwithstanding the above, we endeavor to take all reasonable steps to:

- protect any personal information that we hold from misuse, interference and loss,
- to protect it from unauthorised access, modification or disclosure both physically and through computer security measures;
- destroy or permanently de-identify personal information in accordance with the Privacy Act.

We maintain computer and network security; for example, we use firewalls, anti-virus & anti-spam (security measures for the internet) and other security systems such as user identifiers and passwords to control access to computer systems.

## Data quality

We take reasonable steps to ensure that Personal Information is current, accurate, up- to-date and complete whenever we collect or use or disclose it.

Throughout our dealings with you we will take reasonable steps to confirm the details of your personal information we hold and ask you if there are any changes required.

The accuracy of personal information depends largely on the information you provide to us, so we rely on you to:

- Let us know if there are any errors in your personal information you become aware of;
- Keep us up to date with changes to your personal information (such as your name or address).

## Access to and correct your personal information

Under the Privacy Act 2020, you have the right to access and correct your Personal Information.

In accordance with the Privacy Act 2020 CM Financial Advisers will:

- Give you the opportunity to access the Personal Information, we hold about you, and correct any errors in this Personal Information, generally without restriction.
- You may request access to your Personal Information by contacting your Financial Adviser.
- Provide our dispute resolution procedures to you, should you wish to complain about how CM Financial Advisers handle your Personal Information.

CM Financial Advisers aim to keep client information accurate and up to date. When you receive policy schedules, renewal notices, or other documents from your Financial Adviser, please review them carefully. If you think any information is incorrect, contact your Financial Adviser as soon as possible. Where reasonably possible, your Financial Adviser will update our systems or records or note your request on your file.

If you have a complaint or want more information about how CM Financial Advisers are managing your Personal Information, please contact the Privacy Officer.

For security reasons, any request for details of Personal Information held by CM Financial Advisers must be made in writing.

If you wish to access your personal information, please contact your Financial Adviser or write to Privacy Officer, CM Financial Advisers, 310 Avenue Road East Hastings or email [info@cmfinancialadvisers.co.nz](mailto:info@cmfinancialadvisers.co.nz)

## Do we transfer information overseas?

Any personal information provided to CM Financial Advisers or your Financial Adviser may be transferred to, and stored at, a destination outside New Zealand, including but not limited to Australia, United Kingdom and the United States of America.

Details of the countries we disclose information to may change from time to time. Personal information may also be processed by staff or by other third parties operating outside New Zealand who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, in some cases we may not be able to take reasonable steps to ensure that overseas providers do not breach the Privacy Act and they may not be subject to the same level of protection or obligations that are offered by the Act. By proceeding to acquire our services and products you agree that you cannot seek redress under the Act or against us (to the extent permitted by law) and may not be able to seek redress overseas. If you do not agree to the transfer of your personal information outside New Zealand, please contact us.

If we may need to transfer your personal information to an overseas provider who does not have comparable privacy law protections in place, we will advise you and seek your express consent to provide your personal information to the provider, prior to doing so.

## The sale or restructuring of our business

In the future we may consider the sale or restructure of our business or the purchase of the business of other Insurance Brokers or financial advisers. In such circumstances, it may be necessary for your personal information to be disclosed to permit the parties to assess the sale or restructuring proposals, for example through a due diligence process. We will only disclose your personal information as is necessary for the assessment of any sale or restructure proposals and subject to appropriate procedures to maintain the confidentiality and security of your personal information. If a sale or restructuring proceeds, we will advise you accordingly.

## DIRECT MARKETING

We may use your personal information (including your email address) to send you information about our products, services, events and other marketing activities, including offers from third parties we believe may be relevant to you. Where it is within your reasonable expectations based on your dealings with us, we may also send you direct marketing communications. We may ask related parties to contact you about products and services that may interest you. You can opt in or opt out of direct marketing at any time—please contact your Financial Adviser for more information.

## OUR WEBSITE

You can use our website without providing personal information. We only collect personal information through our website when you knowingly provide it—for example, when you submit an online enquiry or application.

We collect your email address only if you contact us while using our website. Your email address will automatically be added to our database including marketing subscription. You are offered the option to unsubscribe at any time via the marketing emails or by contacting us.

## COOKIES

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use may identify individual users.

- Cookies may be “persistent” or “session” cookies.
- Persistent cookies stay on your device until they expire, or you delete them.
- Session cookies are temporary and are deleted when you close your browser.
- We may use cookies on our website to personalise your visit and to analyse website traffic.
- You can change your browser settings to block cookies or alert you when cookies are used.
- Blocking cookies may limit website functionality.

## COMPLAINTS

If you have a privacy complaint, please contact our office first so we can assist you promptly.

To resolve a complaint, we:

- Will liaise with you to identify and define the nature and cause of the complaint;
- May request that you detail the nature of the complaint in writing;
- Will keep you informed of the likely time within which we will respond to your complaint;
- Will inform you of the reason for our decision in resolving such complaint; and
- Keep a record of the complaint and any action taken in our Register of Complaints.

If you have a complaint, please email us at:

[info@cmfinancialadvisers.co.nz](mailto:info@cmfinancialadvisers.co.nz) or

Write to us at:

310 Avenue Road East, Hastings

Our Privacy Officer will then attempt to resolve the issue or the complaint.

We recommend that you retain this information for future reference.

## HOW TO CONTACT US

To access, correct or update your personal information, make a privacy complaint, opt out of any use of your information (including receiving offers from us), or ask any other question about this Privacy Statement, please contact our Privacy Officer during business hours on:



+64 06 870 7050



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

Attn: Privacy Officer  
Cole Murray  
310 Avenue Road East  
P O Box 12  
Hastings 4156

We welcome your questions and comments about privacy.

This Privacy Statement is current from 1<sup>st</sup> May 2026. If this Privacy Statement or any part thereof is amended or modified in the future, the revised version will be available by contacting our office or on our website.

You can also obtain information on privacy issues in New Zealand on the Privacy Commissioner website at [/www.privacy.org.nz](http://www.privacy.org.nz) or by contacting them by email at [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz) or by calling on +64 4 474 7590.