

General

In this privacy policy, the terms “we”, “us” and “our” refer to **Comprende** Real Estate Limited and our trading name **Comprendé**. We respect the privacy of all users of comprende.co.nz (this website). We are bound by, and comply with, the Privacy Act 2020. This privacy policy explains how we may collect, store, use and disclose personal information that you provide to us. By accessing or using this website you consent to our collecting, storing, using, and disclosing your personal information in a manner set out in this privacy policy.

What is personal information?

Personal information is information about an identifiable individual. It includes information that could be used to identify you, such as your name and contact details. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

Collection

We may collect personal information from you (including, without limitation, your name, email address, phone number, and postal address) when you use this website. You may decide not to provide your personal information to us. However, if you do not provide it, we may not be able to provide you with access to certain information or services.

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in various ways including:

- Through your access and use of our website
- During conversations between you and our representatives
- By telephone, letter, fax or email
- Via social platforms such as Instagram, LinkedIn and Facebook
- By contracting with us or completing relevant forms
- Completing surveys, providing feedback or complaining to us.
- By entering competitions, promotions or requesting information or material from us

In some circumstances information may also be collected from third parties where:

- You authorise the collection of information from a third party which may be your representatives such as lawyer, accountant or employer: and
- The information is already publicly available: and
- Collection is necessary to enforce the law, or for court proceedings, or to protect public revenue

If you provide us with personal information about a third party we collect it on the basis that you have that person's consent for us to collect and handle their personal information in accordance with this privacy policy.

Statistical Information and Cookies

When you visit this website, we may use automated tools and methods (such as cookies and sessions) to collect certain information about your visit, including, without limitation:

- The internet protocol address and domain name used by your computer to connect to the Internet;
- The operating system and the browser your computer uses, and any search engine or inbound hyperlink used to reach this website;
- The date, time, and duration of your visit; and
- The pages viewed by you.

This information may be used in aggregate form to analyse how this website is being used (for example to analyse usage patterns in order to improve this website). Except as set out in this privacy policy, we will not disclose any such information except in aggregate form.

We may gather more extensive information if we are concerned, for example, about abnormal website usage patterns or website security breaches.

What purposes do we use your personal information for?

The information collected will be used by **Comprendé** for the purposes relating to:

- The administration, operation, management and marketing of **Comprendé**, including but not limited to enabling decisions to be made about this form
 - to provide products and services to you and to send communications requested by you;
 - to answer enquiries and provide information or advice about existing and new products or services;
- Marketing goods and services provided by **Comprendé**
- Providing you with customer support
 - to process and respond to any complaint made by you; and
 - to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).
- Communicating with you, including by way of email and other electronic or social media means, in connection with administering your requests and on-going relationship
- Analyse usage of this website

Disclosure of personal information

Upon engaging with us (by signing a scope of engagement or declaration and authority) you authorise us to access any of your contact details that may be held by **Comprendé**. Personal information is collected by **Comprendé**. We take reasonable

steps to protect personal information that is held by us from unauthorised access, use, disclosure, alteration, or destruction.

We will not disclose your personal information to third parties except in accordance with the Privacy Act 2020 and as set out in this privacy policy. We will only use or disclose personal information that you have provided to us, or which we have obtained about you:

- For the above-mentioned purposes; or
- For other purposes authorised by you, including purposes outlined in any form you have completed; or
- If we believe that the use or disclosure is reasonably necessary to assist a law enforcement agency or an agency responsible for national security in the performance of their functions; or
- If we believe that the use or disclosure is reasonably necessary to enforce any legal rights we may have, or is reasonably necessary to protect the rights, property and safety of us, our customers, or others; or
- Professional advisors such as lawyers, accountants, bankers and other consultants as it relates to the services provided to you: or
- External dispute resolution schemes: or
- Suppliers and services that may be required to administer our relationship with you such as IT systems administrators, mailing houses, couriers, payment processors, debt collectors: or
- If we are required or permitted by law to disclose such information.

Storage and security

We may hold your personal information in electronic formats or in hard copy, at our offices or at premises outside our offices, including data storage facilities or online storage located within or outside New Zealand, which may be operated by independent service contractors.

Where your personal information is transferred outside New Zealand we will ensure the intended recipient has provided appropriate safeguards and that requisite rights and remedies in relation to the personal information remain available, or we will obtain your explicit consent for the transfer.

Management of personal information

We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss. This includes electronic and physical security measures and procedures, staff training and use of password protection software.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for legal, insurance and corporate governance purposes, for the

prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our websites. Please bear this in mind when transmitting information by this means to us.

Third Party Websites

This website may contain hyperlinks to websites operated by third parties. We are not responsible for the content of such websites, or the manner in which those websites collect, store, use, or distribute any personal information you provide. When you visit any third party website from a hyperlink displayed on this website, we encourage you to review the privacy statement of that website so that you can understand how the personal information you provide may be collected, stored, used, and disclosed.

Right to Access and Correct

We are bound by, and comply with, the Privacy Act 2020. Under the Privacy Act 2020, you have the right to access and to request correction of any personal information about you held by us.

You may request access to, or correction of, any personal information we hold about you by emailing our privacy office at dave.morgan@comprende.co.nz. If you have a client portal, you can login and update your details there. Please notify us of any changes to ensure the information we hold about you is accurate.

If you have a privacy complaint

If you're not satisfied with our response to any privacy-related concern you may have, you can contact the Privacy Commissioner.

Contact details for the Office of the Privacy Commissioner are:

<https://www.privacy.org.nz/about-us/contact/>

Changes to our Privacy Policy

We reserve the right, at our discretion, to alter this privacy policy at any time. Changes to this policy will take effect immediately once they are published on our website.