

# Privacy Policy - New Zealand Bullion Depository LP

## General Information

This is the Privacy Policy for New Zealand Bullion Depository LP. New Zealand Bullion Depository LP will be referred to as “NZBD”, “we”, “our” and “us” in this Privacy Policy.

The Privacy Policy relates to how we collect, use, share and secure the personal information that you may supply to us. It also describes your choices regarding use, access and correction of your personal information.

We recognise the importance of protecting the privacy of information collected by us, in particular, information that is capable of identifying an individual (“personal information”).

This Privacy Policy governs the manner in which your personal information will be dealt with. New Zealand Bullion Depository LP is the entity collecting and holding your personal information in accordance with this Privacy Policy. We reserve the right, at our discretion, to modify or remove portions of this Privacy Policy at any time. Any changes which are significant or will impact on your rights or freedoms will be notified to you in advance.

New Zealand Bullion Depository LP is responsible for the processing of personal data that it receives under the New Zealand Privacy Act 2020. This data will be held by New Zealand Bullion Depository LP at Po Box 201088, Auckland Airport, Auckland 2150 New Zealand

Please take a moment to read this Privacy Policy carefully. If you have any questions about this Privacy Policy, please contact us at [privacy@nzbd.com](mailto:privacy@nzbd.com) You should review this Privacy Policy periodically so that you are updated on any changes.

## What personal information do we collect?

We collect and hold personal information about, but not limited to:

- customers and potential customers;
- business associates and potential business associates, and their employees and contractors (where applicable);
- individuals we deal with in the course of providing our goods and services to our customers;
- suppliers and their employees and contractors;
- employees, prospective employees and contractors; and
- other people who come into contact with us.

Information we collect may include (but is not limited to): names, identification documents, addresses, contact details, occupations, payment details, employment history, education and qualifications, testimonials, feedback and other information which assists us in conducting our business, providing and marketing our services, and meeting our legal obligations.

## Why do we collect your personal information?

We collect personal information about you in order for us to provide you with our goods and services, for us to conduct our business, for us to contact you about us and our services, and to meet

our legal obligations. We may also collect information about you for any other purposes permitted by law.

In some cases, if personal information we request is not provided, it might adversely impact our ability to supply you with our goods and services or perform our obligations to you.

Any information you provide to us is voluntary. You are free to choose whether to provide us with the types of personal information requested, but we may not be able to serve you as effectively or offer you certain services if you choose not to share certain information with us.

### **How do we collect your personal information?**

We may collect personal information about you through your conduct on our website, email, telephone and through any other interaction you may have with us.

Personal information is collected when provided by you, via the website, email, support, phone or any other interactions you may have with us. For example, we may need to collect personal information to provide you with services or to answer or forward any requests or enquiries that you submit to us. We may also obtain information from other sources and combine that with information we collect through our services. For example, we may collect information about you from third parties, including but not limited to publicly available sources.

Contact with us via our website may include submitting (for instance, but not limited to) your name, email address, address, telephone numbers and other information.

### **Management of Personal Information**

We strive to ensure the security, integrity and privacy of personal information submitted to us, and we regularly review and update our security measures in light of current technologies.

While no data transmission over the Internet can be guaranteed to be totally secure, we will endeavour to take all reasonable steps to ensure the security, on our systems, of the personal information you transmit to us online.

In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

### **Use of Information**

Unless we disclose other uses in this Privacy Policy or at the time of collection, personal information about you is used only for the purpose for which it is submitted or for such other secondary purposes that are directly related to the primary purpose. In general, the purposes for which your personal information is collected, used, held and disclosed are:

- to conduct our business;
- to provide you with our goods and services and any other services you request;
- to market our services to you;

- to engage with third parties on your behalf;
- to communicate with you;
- to help us manage and enhance our services;
- to protect the legal interests of NZBD; and
- for transactions concerning the ownership of NZBD.

We do not share personal information with third parties except for the purposes set out above or unless we are under a legal obligation to do so.

Where information is disclosed to third parties NZBD, wherever possible, imposes contractual restrictions upon the third party in respect of the collection and use of personal information by that third party, or will otherwise take reasonable steps to ensure that the third party is subject to comparable privacy obligations as those set out in the Privacy Act 2020.

Copies of correspondence sent by you, or from the website, that may contain your personal information, are stored as archives for record-keeping and back-up purposes only.

We do not allow the selling of your personal information in any way.

### **Retention and Disclosure of Information**

We take care to allow your personal information to be accessed only by those employees who require it in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it.

#### **We may disclose your personal information:**

- where you have consented;
- where disclosure is necessary to achieve the purpose for which the personal information was submitted; or
- when the law permits or requires disclosure.

We may also disclose your personal information in special situations where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering with (intentionally or unintentionally) our rights or property, users, or anyone else who could be harmed by such activities.

We may engage third parties to support our operations and/or provide you with services on our behalf, for example:

- shipping companies;
- refineries and mints;
- storage companies;
- professional advisors;
- identity verification agencies; and
- credit reporting agencies.

Where we deem it necessary, we may disclose personal information held by us to these third parties solely for the purpose of, and in connection with, performing the particular service or function that

we have engaged the third party to provide. We will endeavour to notify you prior to any such disclosure.

We generally retain personal data only for so long as it may be relevant to the purposes for which it was obtained, to resolve disputes, enforce our agreements, and as required or permitted by law. To dispose of personal data, we may anonymise it, delete it or take other appropriate steps.

Where we no longer require your personal information, we will comply with our legal requirements in respect of that information.

### **Access and Right to lodge a complaint**

You have the right to ask for a copy of the information we hold about you and to ask for it to be corrected if you think it is wrong. If we decline to make a correction to your information that request, you also have the right to ask for a statement to be attached to your information that you had asked for a correction to be made. If you would like to ask for a copy of your information, or to have it corrected please contact us at [privacy@nzbd.com](mailto:privacy@nzbd.com)

If you believe that we have infringed your rights, we encourage you to contact us first at [privacy@nzbd.com](mailto:privacy@nzbd.com) so that we can try to resolve the issue or dispute. You can also complain about our processing of your personal information to the relevant data protection authority.

You can also complain to the New Zealand Privacy Commissioner.

Postal Address

Office of the Privacy Commissioner, PO Box10094, Wellington New Zealand

Enquiries phone line

+64 800 803 909

### **Application of overseas privacy laws**

Our website and services can be accessed by people all over the world, in countries that may have different privacy laws to New Zealand. By visiting our website, accessing our services, or otherwise providing us with your personal information, you acknowledge and agree that your personal information may be processed for the purposes set out in this Privacy Policy, and otherwise in accordance with New Zealand law.

If you are located in a European Union Member State, to the extent that we are subject to the EU General Data Protection Regulation (**GDPR**), we will comply with our obligations under the GDPR in relation to the processing of any personal data that we hold about you or other EU resident individuals.