

# Privacy Policy

## Silver Harbour Capital Limited

This is the Privacy Policy of Silver Harbour Capital Limited (each referred to in this Privacy Policy as “we”, “our” or “us”). Your privacy is important to us. This Privacy Policy governs our collection, use, storage and disclosure of your personal information (as defined in the Privacy Act 1993 (“Act”)) and has been prepared in accordance with our obligations and your rights set out in the Act.

We may update this Privacy Policy from time-to-time. The updated policy will apply from the date we provide an updated copy to you or we upload an updated copy on our website.

### How we collect your personal information?

We collect personal information about you from:

- you, when you provide that personal information to us, including via our website and any related service, through any registration or subscription process, through any contact with us (e.g. telephone calls, emails), or when you acquire or use our products or services;
- third parties, where you have authorised this or the information is publicly available.

### What personal information do we collect?

We only collect personal information that we need for the purposes of providing information, products and services to you (including via our website). The personal information we collect may include:

- your name, residential address, email address and contact telephone numbers;
- your IRD number and tax status;
- documents which verify your identity, residency, ability to work in New Zealand and other personal details, such as your passport, driver's licence, visa or work permit;
- where you are a potential borrower or guarantor, information about your employment, income, assets, liabilities and financial and personal circumstances (including, in some circumstances, a statement of position);
- where you are a potential borrower or guarantor, details about your credit history, credit accounts, credit that may have been extended to you and your repayment history;
- where you are a potential borrower or guarantor, details of any security offered (including property valuations);
- where you are a company, information about your business, its directors and shareholders, its structure and financial position;
- any other information provided by you or specifically related to your communications with us or your use of the our website.

### How do we use your personal information?

We need to collect personal information so that we can provide information, products and services to you and related persons including credit facilities and investments. The personal information collected is used:

- to check your identity to satisfy our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009;
- to respond to communications from you;
- to market our products and services to you, including contacting you electronically (e.g. by text message or email);

- to conduct research and statistical analysis (on an anonymised basis);
  - to improve our products and services;
  - to bill you and to collect money that you owe us, including authorising and processing credit card transactions;
  - in the credit application decision making process;
  - to undertake credit checks on borrowers or guarantors;
  - to prepare and issue loan documents;
  - to carry out any activity in connection with any legal, governmental or regulatory requirement, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;
  - to provide investment opportunities, to process investment applications and to issue & manage investments and related property; and
- for general administrative and business purposes.

We may disclose your personal information to:

- any person engaged by us to provide such information as is necessary for the purposes described above;
- any business that supports our products and services, including any person that hosts or maintains any underlying IT system or data centre that we use to provide our website, or products and services;
- related companies, including Silver Harbour Security Trustee Limited, and any trust of which we are a trustee;
- potential investors who may provide capital to support funding of loans and facilities provided to you or a related person;
- the purchaser of all (or a significant part of) our business (where we are satisfied they will use and protect your information to at least the same standards as us)
- as required by any applicable laws or regulations, or in the course of legal proceedings or other investigations;
- third parties in relation to identity verification, financial credit checks, Companies Office checks, online checks and background and legal checks as deemed appropriate; or
- any other person you authorise us to disclose your personal information to.

You don't have to share your personal information with us. However, withholding it may affect the quality of the products and services you receive or our ability to provide products and services. Please talk to us if you have any concerns.

## **Security and accuracy**

We take reasonable steps to ensure personal information is:

- protected against loss, damage, misuse and unauthorised access. We restrict access to personal information to those individuals who need access to this information in order to assist us in performing our duties and obligations; and
- accurate, up to date, complete, relevant and not misleading.

## **Access to personal information**

You may request:

- confirmation of whether or not we hold any personal information about you; and
- access to any personal information that we hold.

To do so please contact the Privacy Officer at the contact details set out below.

## **Accuracy of information**

Subject to certain grounds for refusal in the Act, you have the right to ask us to correct your personal information when it is inaccurate, incomplete or out of date. To do so please contact the Privacy Officer at the contact details set out below.

## **Internet Use**

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

We use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognise your browser) to monitor your use of our website. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of the website.

## **Privacy Officer – Contact Us**

If you would like to contact us about any matter relating to privacy, our details are:

Roger Su  
Level 2, 81 New North Road  
Eden Terrace  
Auckland 1021  
Email: [roger.su@srrs.co.nz](mailto:roger.su@srrs.co.nz)