

Squirrel Group – Privacy Policy

Date: 16/03/2020

We are committed to protecting our customers' personal information and to complying with our obligations under the Privacy Act 1993. This privacy policy has been written to help you understand how we collect, use, disclose and protect your personal information when visiting our website www.squirrel.co.nz (Website), using the peer-to-peer and wholesale lending platform (Platform), or otherwise accessing our products and services.

By providing us with your personal information, including by accessing the Website, using our products and services, or otherwise engaging with us, you acknowledge that you have read and understood this privacy policy and consent to our use of your personal information in accordance with the terms set out in this policy (as amended from time to time).

The terms "we", "us" and "our" are a reference to Squirrel Group Limited and its related companies including Squirrel Money Limited and Squirrel Mortgages Limited (collectively, the Squirrel Group). References to "you" and "your" are a reference to you.

This privacy policy covers the following topics:

- Personal information collection and use
- Disclosure of information
- How we protect your information
- How long we hold your information for
- Changes to this policy
- How to get in touch with us or access your information

Personal information collection and use

1. We collect and use personal information provided by you through your use of the Website and when you apply for and access our products and services. If you choose not to provide personal information to us on request, this may mean we are unable to provide services to you, or it may affect the quality of those services.
2. We may collect personal information about you through third-party service providers, where you have agreed to the release of such personal information to us.
3. We will not otherwise collect any personal information about you unless we have your permission, or you knowingly provide us the information.
4. The type of personal information that we collect will depend on the purpose for which it is collected, but may include:
 - a. Contact information, such as your name, address, phone number, email address;
 - b. Documentation required to verify your identity, such as a passport or drivers licence;
 - c. Financial information, such as your statement of position, IRD number, tax status, income sources and value;
 - d. Security information, such as your residential property, vehicle details and personal assets;
 - e. Employment information, such as your current employer, position, and work history; and
 - f. Bureau information, such as credit history, anti-money laundering and financial terrorism information.

5. We may use your personal information in the following ways:
 - a. To confirm your identity, contact details, employment, and tax status;
 - b. We collect financial information (income, expenses, debts) to help us assess your creditworthiness to borrow using our Platform or otherwise to provide you with our services;
 - c. If you are a borrower, we may use your personal information to check a third-party credit report;
 - d. Communication between you and us related to our products and services;
 - e. To verify your identity or to run a credit check or other checks for the purpose of registering you as a borrower or investor;
 - f. For the purpose of informing you about our other products and services from time to time (subject to your consent);
 - g. To assist us in developing and improving our services;
 - h. To enforce our rights where necessary, in accordance with any contract or other terms and conditions to which you are subject;
 - i. If you provide content to us (such as comments or reviews), to publish that content on our Website;
 - j. To perform statistical analysis of customer behaviour and use of our Website; and/or
 - k. To comply with our legal obligations, including customer due diligence requirements under the Anti-Money Laundering and Countering Financing of Terrorism Act 2012.

Disclosure of personal information

6. We may disclose information about you (including your identity) to a third-party for the following purposes:
 - a. Carrying out credit and identity checks;
 - b. Undertaking the collection or recovery of debts;
 - c. Conducting legal proceedings or other investigations;
 - d. Providing our services to you;
 - e. Enabling a third party to provide services to us or to you;
 - f. Providing investors, or prospective investors, with sufficient information to undertake due diligence of your loan and for them to comply with any regulatory or legislative requirements as a lender under the Platform;
 - g. As otherwise permitted or required by law.
7. Third-parties that we may share your personal information include:
 - a. Any company within the Squirrel Group, including any of their related companies;
 - b. Our professional advisors and consultants;
 - c. Our third-party service providers (such as IT service providers or market research companies);
 - d. Credit reporting agencies;
 - e. Debt collection agencies;
 - f. Government agencies and regulators;
 - g. Financial institutions; and
 - h. Other third-party suppliers or service providers that you give us permission to share your personal information with.

8. By accessing and using the Website and providing your personal information to us, you acknowledge and agree that you understand that if we disclose your personal information to a credit reporting agency for the purpose of us providing services to you, that agency may hold your information on their credit reporting database and use it for providing credit reporting services and for any other lawful purpose and that agency may disclose your information to their subscribers for the purpose of credit checking or debt collection or for any other lawful purpose.
9. If you are referred to us for a mortgage from a real estate agent, we may confirm to the agent the status of your loan application. This will not include the sharing of any information that might influence the outcome of the property sale.
10. If you are referred to us for a mortgage or personal loan by third-party that has a referral relationship with us, such as a construction company, builder or retailer, we may provide a representative of that third-party the status of your loan application to enable the third-party to provide products or services to you.
11. If you have registered as a borrower and you have asked someone else to register as a co-borrower, each of you acknowledge and agree that:
 - a. you consent to us providing your personal information to the other of you; and
 - b. we will be entitled to accept instructions from either of you in respect of the access to, use of, and amendment to, your personal information by us.
12. We generally hold your information in New Zealand. However, certain personal information may be transferred and/or stored outside of New Zealand by our third-party service providers. Where personal information is transferred outside of New Zealand, we will ensure that such third-party is subject to comparable privacy laws to New Zealand or is required to protect the personal information in a way that is comparable to New Zealand's privacy laws.

How we protect your information

13. Any information captured online is stored on our secure server and in a secured database. IT professionals manage both of these on our behalf. Physical ("hardcopy") information is stored onsite and our building has a monitored alarm.
14. Whilst we strive to do everything reasonably possible to protect your personal information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us and we are not responsible for the theft, destruction, or inadvertent disclosure of your personal information where our security measures have been breached.
15. Any transmission of personal information is conducted at your own risk.

Cookies

16. Information may also be collected through the use of cookies to record your visit to the Website. All information collected via cookies will be held by us. This information will not be made available to any third party in a manner that enables you to be identified. If you do not wish to allow cookies you may change your browser settings to disable cookies however this may result in parts of our Website not functioning properly.

How long we hold your information for

17. We will keep your personal information only for as long as necessary to achieve the purpose we collected it for and in all cases for such periods as we are required to in order to comply with any relevant legislation or regulations.

Changes to this policy

18. We reserve the right to modify or amend this privacy policy from time to time for any reason. Any changes will apply from the date we post the updated privacy policy on the Website.
19. If we make any significant changes, we will provide you with reasonable notice of such changes through the Website or via other means such as email. By using our services and/or accessing the Website after such notice period, you will be deemed to have accepted the updates to this privacy policy. If you do not agree to any change, you must immediately notify us and stop using our services and accessing our Website.

Third party websites

20. The Website may contain links or references to certain third-party websites or material. Information collected by such third parties is governed by that third-party's privacy practices or policies. We accept no responsibility or liability for any third-party practices or policies.

How to get in touch with us or access your information

21. If you have any questions on this privacy policy or would like to request access to or correct the personal information that we have collected about you, you can contact us at:

Write to: Squirrel Group Limited
PO Box 911254, Victoria Street West
Auckland 1142

Email: clientservices@squirrel.co.nz (for Squirrel Mortgages Limited clients)
money@squirrel.co.nz (for Squirrel Money Limited clients)

Phone: 0800 21 22 20

22. If we are not willing to correct errors that you identify in your personal information, you may request that we take reasonable steps to attach a statement to the personal information noting the correction request.