



Privacy Policy

As a business that collects and holds personal information about our clients, we must comply with Code Standard 5 of the Code of Professional Conduct for Financial Advice Services and adhere to the Privacy Act 2020 and its principles.

We only use client information for the purposes that I collect it for, and I do not underestimate the importance of keeping personal information secure during the collection, use, or authorised disclosure when providing my services.

My key obligations:

Ensuring all information is kept secure, whether physical or electronic, and can only be accessed by authorised people

Only collecting information that is needed to provide our services.

Explaining what personal information will be used for when it is collected, and informing the client of their right to access, correct and/or revoke their information anytime they wish to Only using personal information for those purposes that have been authorised by the client. Returning or securely disposing of client information once it is no longer needed.

Reporting any data breach that may cause harm to the client/s to the Privacy Commissioner and affected individuals. Ensuring that all personal information that is collected is protected by safeguards that meet the requirements of New Zealand's privacy laws, including all information that is transferred offshore.

What is personal information?

The Privacy Commission provides the following definition on their website:

Personal information is any piece of information that relates to a living, identifiable human being. People's names, contact details, financial health, purchase records: anything that you can look at and say, "this is about an identifiable person."

It does not need to include the client's name and does not need to be secret or sensitive in nature. It is any information that could be used to identify an individual.



Our Process

1. Client Authorisation

When meeting a client for the first time, We discuss the services that we offer and explain the process followed when providing advice. This involves asking the client to complete a Personal Information Authority & Declaration that outlines:

The purpose for collecting the client's personal information.

What the information will be used for when providing the service

Permission to obtain information for assessing the suitability of products and/or providers.

Consent to send electronic marketing material. Authorisation to share the information with a third party for the purposes of quality assurance, complaint management or to meet regulatory obligations. The clients have the right to access, review and correct any information that I hold about them. We do not provide any personal information, either verbal or written, without explicit consent from the client.

2. Office Security

Any time the office is unattended, it is locked with a monitored security system. Only authorised staff have access to the office.

All physical files containing personal or sensitive information are kept in drawers or cabinets with a lock and key.

All client files are electronically stored and secured by passwords as well as back up data is stored in a removeable hard disk which is stored at safe place other than our office. We do back up the data periodically and shred the physical files once the policies are issued and required data is stored electronically.

When files are not being worked on, they are filed away so that there is no unauthorised access to a client's personal information.

All computers, laptops, and electronic devices as well as software programs are password protected so that they can only be used by those that are permitted.

We follow recommended practices when it comes to creating passwords and do not share or use the same passwords for multiple programs.



We only respond to emails or share information once we are able to verify that I am speaking with the client requesting the information.

3. Data Security

All electronic devices and software programmes are password protected.

We only use internet connectivity or emails where there is a secure WiFi network and an inability for others to access data.

We only use trusted third-party service providers that abide by the Privacy Act 2020 and include assurances in their business agreement or contract.

Our business uses a Customer Relationship Management platform (CRM) provided by The Adviser Platform. Details of how The Adviser Platform fulfils their obligations under The Privacy Act 2020 are included in The Adviser Platform (TAP) Data Privacy & Protection Overview (Appendix A).

Where laptops or electronic devices are unaccounted for, we update passwords for all applicable software programs to prevent the chance of unauthorised access.

The CRM provided by The Adviser Platform only allows a user to be logged into a single device at any one time and all users are logged out after a period of inactivity.

4. Use of Information

We only use information for the purposes it is intended and only after the client has given authorisation to do so.

Their information may be used for the following purposes:

Determining suitability of products for the client's needs
Applying for products supplied by one of our providers.
Underwriting requests from providers when making an offer of terms.
Submitting claims to a provider on the client's behalf
Quality assurance purposes
Third party compliance services
Regulatory requests
Third party offerings that are necessary in the provision of my services to the client.
Electronic marketing (where consent has been given) with the ability for the client to unsubscribe from further electronic marketing material. All personal information will be handed back to the client and/or destroyed once it is no longer required and at the client's request. we require the information to be held on file for 7 years following the end of the client relationship.



5. Breach of Privacy

Where a breach of privacy is suspected, it is reviewed for potential harm to determine what immediate action needs to be taken to prevent any further breach.

If it is concluded that a breach of privacy has occurred, we notify the affected individuals of the breach and let them know how their privacy has been breached, what steps we are taking to limit the breach, and confirm that I will be reporting the breach to the Privacy Commissioner.

I then notify the Privacy Commissioner using the Notify Us function on the website of the Privacy Commission:

<https://www.privacy.org.nz/privacy-for-agencies/privacy-breaches/notify-us/>

Where it is determined that there has been a breach of privacy or there was the potential for a breach to have occurred, it is recorded in my Incident Register and treated in line with my Material Issues and Reporting Policy.

How compliance is monitored?

I AM the nominated Privacy Officer and am responsible for understanding my responsibilities under the Privacy Act 2020.

We review all our advice files for accuracy and compliance with our obligations under this policy. We also have a third-party review of my advice practices on a half yearly basis to ensure ongoing compliance.

Alveo Limited Complaints Policy

Alveo Limited is committed to ensuring good customer outcomes and values the ability of my customers to provide feedback when they are not happy with any aspect of the service they have received. All complaints are recorded and documented in the Alveo Limited Complaints Register and used to identify any trends and implement any required changes in process. What is a Complaint? We define a complaint as any expression of unhappiness or dissatisfaction in relation to any aspect of the service received when engaging with my business. The need for a response may be explicit or implicit. The complaint may arise as part of the advice process, application process or claims process.

138 Hillpark Drive, Pokeno, Franklin, New Zealand, 2402
E: vasu@alveo.co.nz | M: 022 457 8899 | www.alveo.co.nz



The Process

1. Receipt of Complaint: It is important that it is clear what the complaint is about and what resolution the client is seeking. I confirm that the client would like to make a formal complaint and request for them to provide their complaint in writing. I make it clear to them that it is a process of investigating their concerns and looking at the documentation on file. No outcome is presumed until the complaint has been properly investigated and no judgment or comment is made regarding the cause of the complaint until the process has been followed. Once the written complaint has been received, if it is determined that it is of a serious nature, I notify my PI insurer and provide them with details of the complaint. They need to be kept up to date in regards to the process that I go through with each complainant.

2. Acknowledgement: Our aim is to acknowledge a complaint in writing within two working days of being received. The acknowledgement letter lets the customer know that their concerns are being looked into and outlines the process that will be followed. It also lets the client know that they can expect a written response, or if this is not possible, an update within 28 working days. The acknowledgement letter provides a brief summary as to what the complaint is about so that the complainant has the opportunity to clarify whether or not my understanding of the complaint is correct.

3. Investigation: Alveo looks at the details of the complaint and verifies that the version of events or information provided by the complainant align with the documentation held by the business. I don't make any presumption at this stage as to what the outcome will be. The steps of the investigation:

- All documentation relating to the complaint is gathered for review
- All members of the business involved with any aspect of the complaint are spoken to and asked for their recollection of events. This includes requesting any emails that might be on file that have not been saved to the CRM
- A timeline of events is created using the documents on hand
- A factual account of the events relating to the complaint is prepared based on the documentation
- A decision is made as to the outcome of the complaint based on the details gathered during the investigation



4. Written Response: A written response is prepared and given to the client. It is structured in three parts:

- A brief summary of the complaint
- A summary of what was reviewed when looking into the complaint
- The outcome of the review and final response It also provides details of the Approved Resolution Dispute Scheme and explains that they have the option to escalate the complaint if they are not satisfied with the outcome of the response.

5. Deadlock: Where the client disagrees with the outcome of the complaint and are not satisfied with the response, they can request a letter of deadlock. A letter of deadlock confirms that I am unable to reach an agreement and allows the client to submit their complaint to my dispute resolution scheme so that they can investigate the clients concerns and reach an independent decision as to how it should be resolved.

Our Approved Dispute Resolution Scheme is: Financial Services Complaints Limited

PO Box 5967

Wellington PHONE

0800 347 257

04 472 3725

complaints@fscl.org.nz

info@fscl.org.nz

6. Complaints Register: All complaints are registered in my CRM system, provided by The Adviser Platform, including those that do not require a formal response. The reporting is used to identify any trends or themes in regards to customer dissatisfaction. The complaints register is in place to:

- Demonstrate the tracking and management of a complaint
- Demonstrate what actions have been taken and when
- Identify any training needs or process improvements that can be made



- Reduce the number of complaints and prevent similar complaints arising in the future

7.1 Registering the complaint: A new advice process is started in the Client Homepage and 'Complaint' is selected from the dropdown list. All clients involved in the complaint are tagged as well as the adviser involved and initial details of the complaint are recorded including the advice service involved and the complaint type (theme of the complaint). A summary of the complaint is captured covering off the main issues and the written complaint is uploaded to the client file. (At each stage of the complaint process, the related documents are uploaded onto the system in line with my recordkeeping practices) At each stage notes are added so that there is a clear record of the process that was followed and what was involved at each step of the investigation.

7.2 Acknowledging the complaint When the complaint is entered a countdown begins to ensure that the complaint is managed within the timeframes stipulated in my policy. Acknowledgment of a complaint is provided to the client within 2 working days of receiving the formal written complaint. When the complaint is acknowledged, it is documented on the CRM and a note is added confirming when the formal written response needs to be provided by.

7.3 Reviewing and responding to the complaint Once the complaint has been investigated and all the supporting documents have been linked or uploaded to the complaint file, a written response is prepared and sent to the client. The complaint is flagged as having been reviewed and a note is added confirming the details and finding of the investigation and how the response has been provided to the client:

7.4 Resolving or closing out the complaint Once the response has been provided to the client and the outcome has been determined, it is closed out on the system and a final note is added covering off the final interactions with the client and how the response has been received. The final outcome of the complaint is documented and flagged for reporting purposes and a summary of the findings and final outcome of the complaint is noted, including any learnings or possible process improvements on the back of the investigation: How Compliance is Monitored Complaints are monitored and reported back to the director and senior management at the monthly compliance meetings. Alveo Limited has a policy of periodically contacting the vulnerable clients ensuring that their needs, requirements, and any queries are being look after. We at Alveo limited has monthly meeting to discuss any issues regarding vulnerable clients.



138 Hillpark Drive, Pokeno, Franklin, New Zealand, 2402
E: vasu@alveo.co.nz | M: 022 457 8899 | www.alveo.co.nz