

Privacy Statement

FlexiGroup (New Zealand) Limited

General

This credit card or facility is provided by the following subsidiaries of FlexiGroup (New Zealand) Limited:

Columbus Financial Limited: Q Mastercard / Flight Centre Mastercard / Farmers Mastercard

Flexi Cards Limited: bundll

This Privacy Statement sets out our approach to the collection use and disclosure of Your Personal Information. Please read this Privacy Statement carefully. It applies to any personal information that you provide to us or authorise us to collect. By applying for a credit card, using our Website or providing us with personal information in any other way, you authorise us to collect, use and disclose Your Personal Information in accordance with this Privacy Statement.

The protection of Your Personal Information is important to us. We respect your right to be aware of the information we collect about you, how we use it and why, and who else we may share it with. This Privacy Statement applies in addition to, and does not limit, our rights and obligations under the Privacy Act.

1. Defined terms

In this Privacy Statement:

- **we** or **FlexiGroup** or **us** or **our** means Columbus Financial Services Limited, Flexi Cards Limited and/or FlexiGroup (New Zealand) Limited.
- **you** means you, the person using our Services or visiting our Website.
- **Account** means an account maintained by us in the Primary Cardholder's name, having a specified credit limit, to be debited and credited with transactions.
- **Additional Cardholder** means, in relation to an Account, a person that is issued with a Card to use on the Primary Cardholder's Account.
- **Card** means, in relation to an Account, the physical or virtual Card issued to you on the Account and includes any replacement Card.
- **Credit Reporter** means an agency that carries on a business of reporting to other agencies, for payment, information relevant to the assessment of creditworthiness of individuals.
- **Google Analytics** means a web analytics service which tracks and reports website traffic.
- **Primary Cardholder** means, in relation to an Account, the person in whose name we have opened the Account, and does not include any Additional Cardholder.
- **Privacy Act** means the Privacy Act 1993 (as amended or replaced from time to time).
- **Related Company** has the meaning given to that term in section 2(2) of the Companies Act 1993 (read as if the expression "company" in that section includes any body corporate whether incorporated or established).
- **Services** means all products or services we provide and anything else we do for you, including providing you with access to our Website.
- **Website** means this website (as updated from time to time).
- **Wider Group** means FlexiGroup Limited, which is listed on the Australian Stock Exchange (ABN 75122574583) and its Related Companies from time to time.
- **Your Personal Information** means any information about you or that identifies you or can be otherwise linked to you (and if you are a Primary Cardholder, any such information about your Additional Cardholder(s)) which is 'personal information' as defined in the Privacy Act.

2. How We Store Your Personal Information

Security of your information is very important to us. Your Personal Information will be stored by us or a member of the Wider Group in electronic form. We and the Wider Group take reasonable technical and organisational precautions to protect Personal Information that we hold. To help prevent unauthorised transactions, we also recommend you take steps to keep all information about you, your Card, your nominated email account, your mobile device (including those with a digital wallet), and your Account safe.

3. Information We Collect

We collect information about you to provide you with the Service you have selected. We may obtain information and make such enquiries about you for the purposes set out below as we may consider warranted from any source, including directly from you (or any persons authorised by you), from our merchant partners, any member of the Wider Group or from referees, credit reference, fraud prevention and identity verification agencies.

The types of information we collect include:

- key personal information of you and your personal referees, including but not limited to your name, residential and business addresses, telephone numbers, email and other electronics addresses;
- financial and related information, including but not limited to your occupation, accounts, assets, expenses, income, dependents, and regarding your employment, financial and business dealings and other relevant events;
- your transaction history, Services you may have received in the past, your payment history, and the capacity in which you have dealt or deal with us;
- product or service preferences you may have; and
- any other relevant information, including where necessary health and medical information, membership of professional bodies, or other government identifiers.

Generally, we collect this from you. With your consent, we may obtain information about you from others. This allows us to provide and tailor our Services to best suit your needs.

The Wider Group may also collect information from the interactions that you have with us.

Any communications (through any means) between you and us (including any third party service providers and agents who help us deliver our Services) may be recorded for security, record keeping, Account maintenance and/or training purposes.

The information collected may arise from (but is not limited to) the use of apps, emails, Website viewing, application forms, chatbot, live chat facilities and other digital interactions. The types of information collected may include, but is not limited to:

- IP address of the machine you connect to the Website with;
- Operating system and browser your computer used to view the Website;
- Time, duration and date of your visit;
- Pages you viewed;
- Any personal data you choose to share, such as email address and income sources; and
- Any information about you freely available online.

We (or a member of the Wider Group, as applicable) will keep your information for as long as it is required by us, or other members of our Wider Group (even if you close your Account) in order to comply with legal and regulatory requirements, for other operational reasons we deem necessary, including dealing with any queries relating to your Account or for any of the other purposes set out in this Privacy Statement.

If you do not give us the information we ask for or you do not consent (or withdraw your consent) to us collecting, using or disclosing Your Personal Information in accordance with this Privacy Statement, we may not be able to provide you with new Services, or continue to provide you with all or any part of our current Services.

4. How We Use Your Personal Information

We may use, hold and share Your Personal Information with other members of the Wider Group, our merchant partners and third party service providers and agents who help us deliver our Services (including companies that produce our Cards). Your Personal Information is used by us and them:

- to access and process your applications and any future applications and for any other Services we provide (including to verify your identity, perform sanctions screening and credit checks);
- to assess your credit worthiness and manage your credit limit from time to time;
- to establish, administer and manage your Card or Account;
- to manage your participation in any associated rewards programme and to provide requested products and services to you;
- to exercise our rights and fulfil our obligations under any agreement with you;
- to collect any money you may owe us, including the collection of outstanding payments and where necessary, initiating legal proceedings or any enforcement action;
- to maintain credit records with us, any member of the Wider Group, and any external credit reference, Credit Reporter or fraud prevention agencies;
- for undertaking review and maintenance of our systems and infrastructure;
- to plan and conduct market research and to carry out transactional and statistical analysis;
- to communicate with you about your Card or Account;
- for training, quality control and verification purposes;
- to prevent and detect crime, including fraud and money laundering;
- to provide you with information about other products and services, including those of selected third parties, including by mail, email and telephone (including SMS) – for example, information about other Services provided by our Wider Group, by any of our merchant partners – you can opt-out of this by telling us in writing; and
- for any other specified purpose authorised by you or set out in your specific terms and conditions or permitted by applicable law, including the Privacy Act.

We may also use this information to provide you with details of our Services that may be relevant to you, and to ask for your opinion of our Services from time to time.

We may communicate with you by email and other electronic means.

5. Your related persons

When you (or any persons authorised by you) give us information that relates to another person (for example, if you are a Primary Cardholder and you provide information to us that relates to your Additional Cardholder) (that person being the "related person" and

that information is relevant to your relationship with us), you confirm that your related person consents to us collecting, using, holding and sharing their information for the purposes set out below (where we will only do so with the further consent of the related person) and any additional purposes for which the information was collected for, and that you have informed your related person of their rights to access and request correction of their personal information.

6. Sharing Your Personal Information

Subject to this Privacy Statement, we will never pass Your Personal Information (and personal information of your related person) on to another party, except:

- where we have your permission to do so;
- where we are required by law and/or by law enforcement agencies, government entities, tax authorities or regulatory bodies;
- to other members of the Wider Group, or our merchant partners, third party service providers and agents who help us deliver our Services (including companies that produce our Cards), for the purposes described in section 4 above;
- to Credit Reporters and debt collection agencies in connection with us providing credit to you, or recovering from you any amounts that you may owe under any agreement you have with us. This information may include "credit information" as defined in the Credit Reporting Privacy Code 2004 (which may include for example, repayment history, details relating to your Account and payment defaults which they may use to update their database and who may disclose any information they hold about you to their own customers for credit reporting purposes);
- to the Police, or any other government or financial regulatory body who assists in the investigation, prevention and detection of crime in New Zealand or any other country;
- to financial services organisations we bank with, and who are required by law or regulation to obtain information about our customers;
- to any potential assignee or transferee; and
- when we suspect that unlawful activity has been or may be engaged in and the relevant information is a necessary part of the investigation, into or reporting of the suspicion to the appropriate authorities.

In some cases, this may involve the transfer of Your Personal Information outside New Zealand. Please refer to section 10 below for further information about information that we may share with third party websites.

7. The Use of Cookies and Third Party Providers

This Website and the websites of the Wider Group make use of cookies to collect online data through third party companies such as Google Analytics. This process allows the tracking of data such as IP address, geographic location, time spent on the Website and other information relating to interactions on the Website and other digital assets. This information is used for the purpose of monitoring and managing our Website traffic and increasing the quality of the experience we offer to customers and Website users. You may choose not to accept cookies when browsing our Website. However, if you choose not to accept them, some Website information and Services may not be available to you.

8. Quality, Access to and Correction of Information

Information about you is integral to decisions we make about our Services we provide to customers. It is essential that this information is correct, complete and up to date and we take every step that is reasonably practicable to ensure this. You have the right to access and request correction of any of Your Personal Information that is held by us by contacting us at the address shown at the end of this Privacy Statement under the section called 'contact us'. If Your Personal Information changes, including for example, your name, email address, telephone number, billing or residential address, please contact us so that we can continue to provide you with our Services.

9. Privacy and Email Marketing

We exercise responsible email marketing practices and adhere to the guidelines on marketing messaging set out by the Department of Internal Affairs which provide for the following:

- Consent – We will obtain your express, inferred or deemed consent before you are added to any email marketing communications.
- Sender Information – we clearly state when any email communications are sent by us to ensure all recipients know who the email is from.
- Unsubscribe – all marketing email communication includes the ability to unsubscribe from future marketing communications if desired.

If any recipient would like to unsubscribe they are able to do so either from the email itself, or via telephone. If the recipient wishes to unsubscribe via telephone they will be required to provide sufficient proof of identity in order to do so.

For any recipient who has accidentally unsubscribed and would like to opt in to our email communications, they can do so via telephone. A verification process will need to be followed to ensure recipients making such a request are authorised to do so.

10. Links and other Websites

On our Website, or a Website of the Wider Group, there may be advertising or links to third party sites which offer Services and information to you. Where you access one of these third party websites through our Website or a Website of the Wider Group, anonymised information may be shared between us and the third party. Having these links on our Website does not express or imply that we support or recommend any other company, product or service. We do not control, and are not responsible for, the information on any third party site found through our Website.

11. Changing this Privacy Statement

We may change this Privacy Statement at any time by changing or removing existing terms or adding new ones. Changes may take the form of a completely new statement. We will tell you about any changes by posting an updated Privacy Statement on our Website. Any change we make applies from the date we post it on the Website. You are responsible for reviewing this Privacy Statement regularly to ensure that you are aware of any updates.

If you have any questions about our Privacy Statement, ask us your question via our Website, email or telephone.

12. What to do if you have a Complaint or Concern

If you require more detailed information on the way in which we handle information about you, or you are concerned about our treatment of your information, please contact us.

Privacy Officer

E-mail: Privacy.Officer@flexicards.co.nz

Phone: 0800 444 827 or 09 525 8550

Post: FlexiGroup (New Zealand) Ltd
PO Box 90935
Victoria St West
Auckland 1142
Privacy Officer