

1. Introduction

1.1 Purpose

This Policy forms part of FMG's Governance and Internal Control System.

FMG places a great deal of importance on secure privacy of its clients, employees, and third parties. This Privacy Policy has been developed to help you understand what information FMG collects, why it collects it, how it is collected and what it is to be used for.

It also has an effect on all technology devices owned by FMG and provided to its employees. Any material uploaded, downloaded or stored on any of FMG's device is subject to this Policy and can be reviewed at any time by FMG. The Privacy Act 2020 does not protect personal information that has been:

- voluntarily stored or required to be stored on a device or system belonging to an employer;
- voluntarily uploaded on social media platforms.

1.2 Scope

The Policy applies to all FMG employees (current and former), directors, contractors, clients (including prospects) and third parties, and it may be varied from time to time.

1.3 Policy Objectives

Effective privacy controls and processes enable FMG to demonstrate:

- The privacy concepts and controls embedded in the organisation
- Compliance with regulation and regulatory expectation
- Assurance to the Chief Executive and the Board that risks to the Mutual's privacy exposures are being adequately managed

1.4 Governance

This Policy is owned by the Head of Compliance, Risk Quality & General Counsel reporting through to the Compliance Committee and the Board.

2. Privacy Principles

2.1 What is 'personal information'

Personal information is information about a living, identifiable individual and includes facts or an opinion which identifies the individual or is capable of identifying the individual. Individual means a natural person, other than a deceased natural person.

2.2 Collection of personal information

FMG collects personal information about its clients, employees, and third parties and holds this information as a record. FMG will only collect personal information that is relevant to its business and its recruitment processes.

Wherever possible, FMG collects personal information about its clients and employees directly from them or reputable external sources. The information is then processed and stored to provide the associated services.

FMG collects and records clients' communications, including, but not limited to call recordings, emails and correspondence.

The personal information FMG collects includes, but is not limited to, client names, contact details, physical address, insurance history and any additional information FMG requires in order to underwrite the relevant risk or provide advice or relevant services to our clients. We may collect or be provided with personal information about another person or third party who is involved in a claim made to us by our client. FMG will use this information in accordance with this Policy.

When FMG collects your personal information in relation to EQC claims managed by FMG, your information can be used under the EQC Act Section 31 and may be disclosed to the Insurance Claims Register and used to evaluate your insurance, including for underwriting purposes. This information will be disclosed to EQC.

2.3 Storage and security of personal information

FMG stores personal information in a variety of ways including, but not limited to computer systems and databases, hard copy paper files, and telephone recordings.

Personal information is stored in FMG systems and data bases. The information contained in these systems is strictly confidential and must not be accessed unless there is a **legitimate purpose**; this includes, but is not limited to servicing a client's account, managing a claim or complaint or using it for a legitimate purpose which the information was collected for.

Accessing personal information without a **legitimate purpose** constitutes a breach under the Privacy Act 2020.

2.4 Access to personal information

Clients, employees, and third parties have a right to access any personal information held about them in accordance with the Privacy Act 2020; however, they are entitled to and can only access their own personal information.

FMG will respond to the person requesting access to the personal information within ten (10) working days after a request is received. The response will include whether or not their personal information is held by FMG and if it can be disclosed to them.

2.5 Correction of personal information

An individual can request that their personal information held by FMG be corrected.

2.6 Accuracy of personal information

FMG relies on the accuracy of its clients', employees' and third parties' personal information to efficiently provide its services. FMG is continually improving its clients' data quality to ensure that any personal information it collects, uses, or discloses is accurate, complete and up-to-date.

2.7 Retention of personal information

FMG keeps personal information for seven (7) years or as long as there is a business need and /or legislative requirements to retain it.

2.8 Limits on use of personal information

FMG will not use personal information obtained in connection with one purpose for any other purpose, unless it believes on reasonable grounds that any one of the exceptions set out in Principle 10 of the Privacy Act 2020 applies.

Using or accessing personal information for a non-**legitimate purpose** by FMG's employees constitutes a breach of the Privacy Act. This will also potentially be regarded as a misconduct, within the meaning of the Standards of Conduct Policy and the failure to adhere to other internal policies.

2.9 Sharing of personal information

FMG may share personal information with some external service providers, including, but not limited to the Insurance Claims Register, Insurance Fraud Bureau, external assessors, repair agents, claims suppliers, claims repairers, payroll processors, superannuation providers, insurance companies underwriting personal insurance products, banks, Crown departments, and credit check companies.

In relation to EQC claims managed by FMG, your personal information can be used under the EQC Act Section 31 and may be disclosed to the Insurance Claims Register and used to evaluate your insurance, including for underwriting purposes.

3. Disputes

If you would like to make a privacy-related complaint, please contact our Privacy Officer. Their contact details are:

FMG, PwC Centre, Level 1, 10 Waterloo Quay, Pipitea, Wellington 6011 (ATTENTION PRIVACY OFFICER) or 0800 366 466.

If you are not satisfied with FMG's response, you can refer your complaint to the Privacy Commissioner. Their contact details are available on their website www.privacy.org.nz.

4. Related Policies

The related policies include, but are not limited to:

Code of Ethics

Culture and Conduct Policy

Information Management Policy

Respectful Workplace Policy

Standards of Conduct Policy

Vehicle Policy

5. Policy Compliance

Policy Compliance Monitoring

FMG must ensure that we are able to demonstrate compliance to the principles and requirements of this Policy by implementing appropriate policies, processes, procedures and frameworks.

Compliance Monitoring & Reporting:

As a minimum the following compliance monitoring should be performed:

- Review and confirm compliance at least once a year.
- Review and signed off annually by the Board

Any non-compliance must be reported to the Head of Compliance, Risk Quality & General Counsel, Legal Counsel and /or Compliance Committee and /or the Board.

6. Roles and Responsibilities

Role	Responsibilities
The Board / Compliance Committee / Head of Compliance /Risk Quality & General Counsel	<ul style="list-style-type: none"> • Reviews and approves the Policy; • Escalation point for breaches of the Policy.
All employees /contractors /directors	<ul style="list-style-type: none"> • Identify, measure, manage, monitor and report on all known privacy issues or breaches. • Escalate per above.

7. Definitions

Term	Definition
Employee	<ul style="list-style-type: none"> • Employee – any person who is employed in a part or full-time capacity
Contractor	<ul style="list-style-type: none"> • Contractor – a contractor that is in the position to act on behalf of FMG and which offers service to FMG in exchange for payment.
Director	<ul style="list-style-type: none"> • Director – a Member elected Director or Special Director per the definition of the Farmers’ Mutual Group Act and Constitution.
Client	<ul style="list-style-type: none"> • Client – a client of the Mutual that holds a policy of insurance
Prospect	<ul style="list-style-type: none"> • Prospect – a potential of client of the Mutual that has provided personal information to the Mutual in relation to obtaining insurance cover.

Key Contacts	<ul style="list-style-type: none"> • Executive Policy Owner: Head of Compliance, Risk Quality & General Counsel • Policy Managing Owner: Legal Counsel 	
Approval Authority	FMG Board	
Version / Dates	<p>Current Version: 1</p> <p>Date published: 2021</p> <p>Date of next review: June 2022</p>	<p>Prior Version: June 2020</p> <p>Prior Published: June 2020</p>