

**Honan.**  
Insurance. Advice. Support.

HONAN INSURANCE GROUP PTY LTD  
NEW ZEALAND

# CLIENT INFORMATION AND PRIVACY POLICY

## CLIENT INFORMATION AND PRIVACY POLICY

### Why is this policy important?

Establishing and maintaining a trust-based relationship with our clients is central to our effectiveness as a broker. Maintaining confidentiality as regards client information is fundamental to that trust.

Client information includes all information about the client that is collected or held by a person who gives Financial Advice. That includes information in work papers and records, and the Financial Advice given to the client. This includes personal information under the Privacy Act (which is information about an identifiable individual) but is broader as it also includes information relating to entities.

Standard 5 of the Code of Professional Conduct for Financial Advice Services (the Code) sets out clear requirements regarding the handling of client information. Client information is broader than personal information under the Privacy Act to the extent that it relates to personal information, however the standard is intended to be applied consistently with obligations under the Privacy Act.

This policy sets out our approach to dealing with client information. The policy should be read in conjunction with the Information Security Policy.

### OUR POLICY

**We:**

- Ensure that client information is only used, retained or disclosed:
  - for the purpose of giving Financial Advice to the client;
  - for another purpose that is directly related to giving the Financial Advice;
  - if the use, retention or disclosure is required or permitted by law; and
  - for another purpose if the client has agreed.
- Inform clients how their information will be collected, used, retained or disclosed by providing a privacy notice;
- Ensure that client information is retained only for as long as it is required for one or more of the above reasons (consistent with our record-keeping policy);
- Allow clients to access and correct their personal information, unless an exception under the Privacy Act applies;
- Ensure that when the client information is no longer needed, it is returned to the client or disposed of securely in accordance with our Record Keeping Policy and Information Security Policy;
- Appoint a Privacy Officer who understands their responsibilities under the Privacy Act;
- Regularly train our people so they understand what we need to do to ensure compliance with privacy laws, spot and report privacy breaches, and manage privacy requests and corrections;
- Ensure that physical and electronic security measures and protocols are maintained so that only authorised personnel of our FAP have access to client information;

- If a privacy breach occurs that is likely to cause harm, we inform the individual and the Office of the Privacy Commissioner as soon as reasonable. If this is a material information security breach, we also notify the FMA.
- Obtain consent from clients for their information to be provided to regulatory bodies should it be required for supervisory purposes;
- Obtain consent before sending any electronic marketing messages and provide an unsubscribe mechanism;
- Have contractual protections in place to provide the same protections under the NZ Privacy Act when we outsource and transfer personal information offshore.

The do's and don'ts below will help you identify when you are dealing with personal information and ensure that you collect, use, disclose and store that information properly.

	Do	Don't	Explanation/comments
<b>Identification of personal information</b>	<ul style="list-style-type: none"> <li>- ensure that you understand what type of information is considered to be personal information</li> <li>- ensure that you recognise when personal information is sensitive</li> <li>- ensure that the do's below apply to all personal information you handle in your role</li> </ul>	<ul style="list-style-type: none"> <li>- assume that you are not dealing with personal information just because you don't know the name of the individual to which the information relates or you don't think the information is secret or important</li> </ul>	<p>Under the Privacy Act, <b>personal information</b> is information or an opinion about an identified individual, or an individual who is reasonably identifiable. Personal information includes a person's:</p> <ul style="list-style-type: none"> <li>■ name</li> <li>■ telephone number</li> <li>■ address</li> <li>■ credit card details</li> <li>■ licence or passport information</li> <li>■ an online identifier</li> <li>■ photographs of an individual</li> </ul> <p>There is a category of personal information known as <b>sensitive information</b>. Sensitive information needs more protection because there is a higher probability of harm if the information is misused. Sensitive information includes information or an opinion about an individual's racial or ethnic origin, criminal record, sexual orientation, or health or medical condition.</p>

	Do	Don't	Explanation/comments
<b>Collection of personal information</b>	<ul style="list-style-type: none"> <li>- only collect information about an individual that is reasonably necessary to provide the services you intend to provide</li> <li>- only collect information about an individual from that individual unless it is not practical to do so</li> <li>- do not collect sensitive information without first obtaining the individual's consent</li> <li>- provide a copy of Honan's Collection Statement before collecting personal information</li> </ul>	<ul style="list-style-type: none"> <li>- collect or ask for personal information that you do not need to provide the services you intend to provide</li> </ul>	<p>Most of the time you will know what type of personal information you need to provide services – for example, the personal information you need to arrange insurance for a client will largely be determined by the insurer and will not necessarily be the same as the information you need when assisting a client to make a claim under their policy.</p> <p>A copy of Honan's Collection Statement is in <b>Appendix A</b>. The Collection Statement is also on Honan's Important Notices page.</p>
<b>Disclosure or use of personal information</b>	<ul style="list-style-type: none"> <li>- only disclose or use personal information you have collected for the purpose for which it was collected</li> <li>- if disclosing personal information to an insurer located outside of Australia, tell your client where the insurer is located</li> <li>- obtain the consent of the individual if you wish to disclose or use that</li> </ul>	<ul style="list-style-type: none"> <li>- disclose or use personal information for a purpose unrelated to the services you are providing</li> <li>- disclose, sell, trade or rent personal information to third parties</li> </ul>	<p>In almost all cases you will be collecting personal information for the purpose of obtaining quotes from insurers, arranging insurance, assisting with premium funding or assisting with a claim. You should not be using or disclosing personal information for any other purpose. Honan's Privacy Policy states that your client's contact details may also be used so Honan can send direct marketing communications. Your clients always have the option of electing not to receive this information. If you are told by a client that they do not wish to receive marketing communications from us, please immediately let the marketing team know so we can</p>

	Do	Don't	Explanation/comments
	individual's personal information for a purpose other than the purpose for which it was collected.		immediately stop sending these communications.
<b>Storing personal information</b>	<ul style="list-style-type: none"> <li>- protect and keep secure the personal information you hold from unauthorised access, loss, misuse, interference or disclosure</li> <li>- encourage clients to send documents containing personal information in encrypted form</li> </ul>	<ul style="list-style-type: none"> <li>- share personal information with other people (Honan staff or external people) who do not need to see the information for the purpose for which it was collected</li> <li>- be careless with storing any personal information you have collected</li> <li>- store personal information you have collected on any computer, device or system other than your work computer, Honan approved device and Honan network.</li> </ul>	It is the responsibility of all staff to protect the personal information we collect and use for the purpose of providing our services. Honan's Technology team maintains a secure IT environment to store information, but we need staff to take the right steps to prevent unauthorised access to our systems and information. Honan has a number of IT and data protection policies which you are required to follow.
<b>Loss or suspected loss of personal information</b>	- immediately notify Honan's Head of Technology and/or General Counsel if you become aware or suspect any loss of personal information (whether the information was held by you or any other person)	- ignore or fail to report any loss or suspected loss of personal information	Honan will always investigate, mitigate and where necessary report any loss, theft or unauthorised use of or access to personal information. It is important that you report this immediately upon becoming aware so that appropriate steps can be taken, quickly. Human errors - such as losing a device, sending an email to the incorrect recipient, or accidentally clicking on a malicious

	Do	Don't	Explanation/comments
			link – are all common causes of loss or unauthorised access to personal information. However, sometimes you might hear or see something which causes you to suspect that personal information might be at risk of compromise. If in doubt, report immediately.
<b>Access and correction of personal information</b>	<ul style="list-style-type: none"> <li>- give access to an individual who requests access to personal information you hold about them</li> <li>- take steps to correct personal information which is inaccurate, irrelevant, out of date, misleading or incomplete</li> </ul>	<ul style="list-style-type: none"> <li>- ignore a request to access or correct personal information</li> <li>- allow access to personal information by a person who has not been identified as the person to whom the information relates</li> </ul>	Please speak with Honan's Legal team if you receive a request for access to or correction of personal information and you cannot determine whether personal information belongs to the individual making the request. We may, in limited circumstances, refuse access or refuse a request for correction.
<b>Privacy related complaints</b>	<ul style="list-style-type: none"> <li>- refer any complaints or concerns about how Honan has complied with the Privacy Act or handled personal information to Honan's Privacy Officer.</li> </ul>	<ul style="list-style-type: none"> <li>- ignore or disregard any complaint or concern relating to privacy or handling of personal information</li> </ul>	Honan's Privacy Officer is Sade Dikmen. Honon has a dedicated email address for privacy related concerns and complaints: <a href="mailto:privacyofficer@honon.com.au">privacyofficer@honon.com.au</a>

## IMPLEMENTATION

All brokers and employees receive induction and refresher training on the contents of this policy.

Formal client consent is obtained for the use of information on file.

IT security and information access protocols are in place.

Secure document storage and destruction facilities are in place.

## ENSURING COMPLIANCE

There is ongoing monitoring of broker and employee activity and behaviour.

We obtain broker and employee attestations. We also regularly review and audit client files and internal IT access protocols.

## REVIEW AND VERSION CONTROL

This policy is reviewed annually.

Version no	Reviewed by	Reviewed Date	Key Changes or no changes
3	Legal	8 November 2023	Minor updates