

HOMELY NEW ZEALAND LIMITED – PRIVACY POLICY

Homely New Zealand Limited (NZCN 9262369) (**we, us or our**), understands that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, when interacting with you.

The information we collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

The types of personal information we may collect about you include:

- **Identity Data** including your name, age, profession, photographic identification, marital status, pronouns, and gender.
- **Contact Data** including your telephone number, address and email.
- **Financial Data** including bank account and payment card details (through our third party payment processor, who stores such information and we do not have access to that information). This also includes income, expenses, employment details, bank statements, transaction information, assets, liabilities, credit-related information, tax or income evidence, and other information relevant to a home loan application or advice process.
- **Property and Loan Data** including property details, purchase price, deposit, loan purpose, loan amount, valuations, offer documents, lender correspondence and related application information.
- **Background Verification Data** including your government-issued identification details requested as part of our onboarding OR verification OR Know Your Customer process to comply with our due diligence obligations, anti-money laundering laws and related ongoing monitoring commitments.
- **Open Banking and Third-Party Data** including information obtained through open banking or data-sharing providers with your consent.
- **Credit and Verification Data** including information from credit reporters, identity verification providers or other verification sources where authorised or permitted by law.
- **Transaction Data** including details about payments to you from us and from you to us and other details of products and services you have purchased from us or we have purchased from you.
- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies or analytics), and communications with our website.
- **Profile Data** including your username and password for Homely profile picture, purchases or orders you have made with us, content you post, send receive and share through our platform, information you have shared with our social media platforms, and support requests you have made.
- **Interaction Data** including information you provide to us when you participate in any interactive features, including surveys, contests, promotions, activities or events.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.

How we collect personal information

We collect personal information in a variety of ways, including:

- when you interact directly with us, including face-to-face, over the phone, over email, or online;
- when you complete a form, such as registering for any events or newsletters, or responding to surveys;
- when you apply for a job with us;
- from third parties, such as details of your use of any website we operate (from our analytics and cookie providers and marketing providers. Where we collect personal information about you from a third party source other than you (other than the personal information which we have specified will be collected by us in

accordance with this Privacy Policy) we will take reasonable steps to notify you of such collection, including the fact that the information has been collected, the purpose for which the information has been collected, the intended recipients of the information, and the name and address of the agency that is holding the information, as required by law. See the “Cookies” section below for more detail on the use of cookies); or

- from publicly available sources, such as social media or the New Zealand Companies Office.

Why we collect, hold, use and disclose personal information

Personal information: We collect, hold, use and disclose your personal information for the following purposes:

- to enable you to access and use our software, including to provide you with a login;
- to assess whether to take you on as a new client, including to perform anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks on you;
- to do business with you, including to dispatch and deliver our services to you, register your attendance at our events, assess your application, manage your appointments;
- to provide and improve the Homely platform and services;
- to assess your needs and circumstances within our agreed advice scope and provide financial advice services in relation to home loans and mortgages;
- to prepare, submit, support or monitor home loan applications or enquiries;
- to match or compare indicative lender options, rates, criteria or product features;
- to contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us;
- to contact and communicate with you about any enquiries you make with us via any website we operate;
- for internal record keeping, administrative, invoicing and billing purposes;
- to verify your identity, detect fraud and support security;
- to obtain or process open banking, credit, verification or application information where authorised;
- for analytics (including profiling on our website), market research and business development, including to operate and improve our business, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you;
- to run promotions, competitions and/or offer additional benefits to you;
- to manage complaints, disputes, quality assurance, training and compliance reviews;
- to improve, test and monitor our platform, AI tools, security and customer experience;
- if you have applied for employment with us, to consider your employment application; and
- to comply with our legal obligations or if otherwise required or authorised by law.

Artificial Intelligence

We use artificial intelligence and machine learning technologies in our business operations and services, including AI tools provided by third parties. We only use these technologies when legally permitted and necessary for our business.

How we use AI

We may use automation and AI-assisted tools for the following purposes:

- to extract information from documents, classify information, summarise data and compare lender criteria;
- to conduct analysis and data processing, including in relation to home loan application data such as bank statements, income documents and property information;
- to support application preparation and facilitate lender matching and referrals;
- to assist our financial advice and compliance processes;

- to improve and optimise our platform, services and operations;
- to automate routine tasks and communications;
- to personalise your experience with our services;
- to support quality assurance processes; and
- to assist with customer support and queries.

Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers;
- lenders and credit providers you choose or that are relevant to your application or advice process;
- financial advisers, nominated representatives, aggregators, compliance advisers, or other parties involved in providing or supervising Homely's financial advice service;
- open banking providers, identity verification providers, credit reporters, document processing providers, payment providers, cloud hosting providers, analytics providers, AI service providers, cybersecurity providers and other technology or infrastructure providers;
- marketing or advertising providers such as Google, LinkedIn, Facebook, Instagram or Twitter;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators including, but not limited to, Paypal, Stripe and Shopify Payments;
- our existing or potential agents or business partners or suppliers;
- sponsors or promoters of any promotions or competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights; and
- third parties to collect and process data, such as Google Analytics, Meta Pixel or other relevant analytics businesses;
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure

Personal Information

While we store personal information in New Zealand, where we disclose your personal information to the third parties listed above, these third parties may store, transfer or access personal information outside of New Zealand. We will only disclose your personal information overseas in accordance with the New Zealand Privacy Principles.

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to do business with you.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to

your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

Deletion: You may ask us to delete information we hold about you. However, we may need to retain certain information where required or permitted by law, including financial advice, application, complaint, audit, tax, AML/CFT or compliance records.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you may contact the Office of the New Zealand Privacy Commissioner.

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

Email: contact@homely.co.nz

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