

Privacy Policy

Your privacy is extremely important to us.

Our Privacy Policy aims to communicate, in the clearest way possible, how we treat your personal information. We encourage you to read this Privacy Policy carefully. It will help you make informed decisions about sharing your personal information with us.

At Greytown Orchards we have a few fundamental principles:

- We will **always** collect, store, use and disclose personal information in accordance with all applicable privacy laws. However, we have also put in place this Privacy Policy to protect personal information you submit or we collect.
- We will **only** use your personal information when it is necessary for us to deliver you our services or perform other necessary business functions and activities.
- We will **not** use or disclose your personal information for purposes unrelated to our business activities and the services we provide, unless we first obtain your consent.

Privacy Policy

This Privacy Policy sets out how we comply with our obligations under the Privacy Act 1993 and New Zealand Information Privacy Principles.

We are bound by the requirements of those laws, which regulate how we may collect, store, use and disclose your personal information. Those laws also specify how individuals may access and correct information held about them.

“Personal information” means information about an identifiable individual. By way of example, this type of information includes your name, contact details, health and medical information.

In this Privacy Policy “we”, “us” and “our” and “Greytown Orchards” refers to Greytown Orchards Limited Partnership and its related companies and affiliates.

Your Consent

Our business involves the storage of information and data (including personal information) that is submitted by you, or with your authority.

By providing your personal information to us from time to time, you consent to our collection, storage, use and disclosure of your personal information in accordance with this Privacy Policy.

Changes to this Privacy Policy

We may modify, amend, change or replace any of the terms, conditions or provisions of this Privacy Policy from time to time, and will notify you of any changes by posting an updated version on our website or by sending you a notice via email to the contact address you have

provided to us. It is your responsibility to check this Privacy Policy periodically for changes, and to keep your contact address current.

Your continued use of our services following notification of any changes to this Privacy Policy constitutes acceptance of those changes. If you do not agree with any aspect of the updated Privacy Policy, you must immediately notify us (and, in the case of our website, immediately cease all use of our online services).

1. What information do we collect?

Greytown Orchards collects information you provide

Any personal information that you provide to us is collected and managed by us or on our behalf. Our usual practice is to collect personal information directly from you, either via the Greytown Orchards website, or via an Greytown Orchards document or personnel, when you:

- complete an Application for Occupation Licence for Greytown Orchards;
- complete any online form on our website;
- subscribe to receive marketing and sales material or communications;
- otherwise complete a hard copy form or provide information to Greytown Orchards, including as part of your application process;
- contact Greytown Orchards; or
- visit our website.

You may provide personal information about yourself such as your name, date of birth, gender, marital status, residential address, email and contact details, information regarding access to our website, photos, financial information, health information, legal information, and your activities including lifestyle and other interests.

You can always choose not to provide your personal information to Greytown Orchards, but it may mean that we are unable to provide our services to you.

Greytown Orchards collects personal information about you from others

Greytown Orchards may also collect information about you from others such as your legal representatives, medical personnel, your family members (for instance, where any concerns arise), other residents (for instance, if there is a dispute or complaint) or from other organisations who have had dealings with you and may contact us.

Greytown Orchards collects personal information from you about others.

Greytown Orchards may also collect information from you about someone else. If you provide Greytown Orchards with personal information about someone else, you must ensure that you are authorised to disclose that personal information to Greytown Orchards and that, without Greytown Orchards taking any further steps required by applicable data protection and privacy laws, Greytown Orchards may collect, use, store and disclose such personal information for the purposes described in this Privacy Policy.

This means you must take reasonable steps to ensure the individual concerned is aware of and consents to the various matters detailed in this Privacy Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to access that information, Greytown Orchards's identity and how to contact Greytown Orchards.

Where requested to do so by Greytown Orchards, you must also assist Greytown Orchards with any requests by the individual to access or update the personal information you have collected from them and provided to us.

Cookies and other monitoring devices

We may collect aggregated information by using cookies. Cookies are unique identification numbers like tags that are placed on the browser of internet users. The cookies do not in themselves identify users personally, but may link back to a database record about them. We may use cookies to track any aspect of our website.

We may use services such as Google Analytics, which will issue cookies from their own servers and which will be able to track website visitors throughout relevant websites. We do not control how those cookies are issued, or the data that they store.

We may use "web beacons" (electronic images also known as pixel tags or clear gifs) to recognise a cookie on your computer when you view or act upon a web page, an advertisement that we have placed on a third party web page, or an email or other electronic communication that we have sent.

We may also use Local Shared Objects, sometimes referred to as "Flash" cookies. Use of Local Shared Objects can help deter, detect and prevent fraud and can support our online services.

Please note that we may sometimes use AI as a note-taking tool to record meetings or telephone conversations that you have with us. We will let you know at the start of the meeting or call if we are intending to do this and if so, we will offer to send you a copy of the notes for your records too.

2. How is your personal information used?

Greytown Orchards collects your personal information so that we can provide you with retirement lifestyle products and services and any related products or services you may request. In doing so, Greytown Orchards may use the personal information we have collected from you for purposes related to our business including to:

- verify your identity;
- administer the products and services we provide;
- notify you of new or changed products or services;
- carry out marketing or training in connection with the products and services we provide;
- assist with the resolution of any technical support issues or other issues relating to our website;

- comply with all laws and regulations in applicable jurisdictions; and
- communicate with you.

By using our services, you consent to your personal information being collected, stored, used and disclosed in this way and for any other use you authorise. Greytown Orchards will only use your personal information for purposes described in this Privacy Policy, or with your consent.

Please be aware that our arrangements with you does not create any protected or fiduciary relationship, such as that of physician-patient or solicitor-client. Accordingly, while communications between you and Greytown Orchards are protected by this Privacy Policy, they are not protected by physician-patient privilege, doctor-patient confidentiality, solicitor-client privilege, or otherwise.

3. In what very limited circumstances might we disclose your personal information?

Your personal information will not be sold, traded rented or otherwise provided to others without your consent.

We will only disclose your personal information to anyone outside Greytown Orchards and its related companies if it is necessary and appropriate to facilitate the purpose for which your personal information was collected pursuant to this Privacy Policy, or a directly related purpose.

We may share personal information within Greytown Orchards and with third parties. The types of third parties to whom we may disclose personal information includes our service providers who assist us in providing our products and services such as organisations who provide banking, mailhouse, recruitment, call centre, health and technology services.

We will not otherwise disclose your personal information unless we believe on reasonable grounds that you have provided your authorisation. However, you should be aware that we may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information.

4. Storage and security

We are committed to protecting the security of your personal information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure.

However, the Internet is not in itself a secure environment, and we cannot give an absolute assurance that your personal information will be secure at all times. Transmission of personal information over the Internet is at your own risk and you should only enter, or instruct the entering of, personal information within a secure environment.

We will advise you at the first reasonable opportunity upon discovering or being advised of a security breach where your personal information is lost, stolen, accessed, used, disclosed, copied, modified or disposed of by any unauthorised persons or in any unauthorised manner.

It is your responsibility to keep your login details, password and security questions in respect of our business with you safe and secure. You should notify us as soon as possible if you become aware of any unauthorised use of your login details, password or security questions, and immediately change that security information promptly.

5. What about links to other websites?

Our website may contain links to other websites that are not under our control. These websites may use cookies. It is the responsibility of those third parties to collect appropriate consents from you in order to permit their own cookies (to the extent this is required by law) and to inform you about the cookies they use. You should check the Privacy Policy on all third party websites to ensure you are comfortable with third party cookies.

We have no responsibility for linked websites, and provide them solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or warranties about their accuracy, content or thoroughness. Your disclosure of personal information to third party websites is at your own risk.

6. Email, text and telephone communications

We are committed to full compliance with the Unsolicited Electronic Messages Act 2007.

By subscribing to emails and/or text communications, or otherwise providing your email address and/or mobile number, you consent to receiving emails and/or texts (as the case may be) which promote and market our products and services, or the products and services of others, from time to time.

You can unsubscribe from our email communications and/or text communications at any time by clicking the “Unsubscribe” link in any promotional or marketing email or text received or by emailing privacy@greytownorchards.co.nz.

Once you have unsubscribed from the email or text communications, you will be removed from the corresponding marketing list as soon as is reasonably practicable.

7. How you can access or correct your personal information

It is your responsibility to ensure that the personal information you enter into our website is accurate, complete and up-to-date. You may request access to the information we hold about you, or request that we update or correct any personal information we hold about you, by setting out your request in writing and sending it to us at privacy@greytownorchards.co.nz.

We will review your request as soon as reasonably practicable. If we are unable to give you access to the information you have requested, we will give you reasons for this decision when we respond to your request.



We will only keep your personal information for as long as we require it for the purposes of operating our business. However, we may also be required to keep some of your personal information for specified periods of time, for example under certain laws relating to companies, money laundering and financial reporting legislation.

8. Privacy Officers

We take your concerns seriously. If you have any concerns about privacy or the use or collection of your personal information by Greytown Orchards please contact our Privacy Officer at:

Email: privacy@greytownorchards.co.nz

Physical: Level 1, 24 Porter Drive, Havelock North 4130

Postal: P.O. Box 2308, Hastings 4156

Phone: +64 27 6700744

We will respond as quickly as possible (our target response is 30 days) and handle all complaints in a way that is fair and consistent. However, if you remain dissatisfied, you can make a formal complaint with Office of the Privacy Commissioner.