

Privacy Policy — Effective from May 2018 to May 2019

Version: March 2018

In this Privacy Policy, a reference to *Harmony, we, our or us* means each of Harmony Nominee Limited, Harmony Limited, Harmony Investor Trustee Limited, Harmony Services Limited and Harmony Corp Limited, together with any related companies (as defined in the Companies Act 1993) of those entities from time to time.

We recognise that your privacy is very important to you and that you have the right to control your personal information.

This Privacy Policy governs the collection, use and disclosure of your personal information by us and has been prepared in accordance with our obligations and your rights set out in the New Zealand Privacy Act 1993 (Privacy Act) and applicable codes under the Privacy Act. To the extent applicable, this Privacy Policy also applies to investors in the Harmony platform (Investors).

We reserve the right to modify or amend this Privacy Policy at any time and for any reason. We recommend that you check our Privacy Policy from time to time.

By accessing and using this website (Site) you consent to our use of your personal information in accordance with this Privacy Policy (as amended from time to time).

This Privacy Policy explains:

- What kind of personal information we collect and what we do with that information.
- Where we collect personal information from.
- Who we may use to collect personal information.
- How we use and disclose personal information.
- The consequences of you not providing the personal information we request from you.
- How we store personal information.
- How you can access and where applicable amend your personal information.
- How long we hold personal information.
- Who you can contact for further information.

What kind of personal information we collect

We collect the personal information you give us, which may include:

- Your name, e-mail address, residential address, contact telephone numbers.
- Your IRD number and tax status.
- Information about your employment, your income, and your financial and personal circumstances.
- Where relevant, specific documents which verify your identity and other personal details (such as your passport or driver's licence number).
- Details about your credit history, credit accounts, credit that may have been extended to you and your repayment history.

We may also keep a record of any information that you acquire from us.

You can visit this Site without telling us who you are or revealing other personal information.

Where we collect personal information from

We collect personal information through this Site by the following means:

- By you contacting us enquiring about information about us and the services we provide.
- When you register on the Site as a Borrower or as an Investor.
- When you make an application on the Site for a loan or, in relation to Investors only, to make an investment.
- When you participate in any promotions we may make available, or competitions that we may run, through this Site.

If you are or want to be a Borrower, we may collect personal information about you from credit checking agencies (Credit Reporters). By registering as a Borrower or applying for a loan through the Site, you authorise us to obtain personal information about you from a Credit Reporter.

We may also collect personal information through public sources and through third party service providers, where you have agreed to the release of such personal information to third parties or to us.

We will not otherwise collect any personal information about you except when you knowingly provide it.

Who we may use to collect your personal information

- Our agents;
- your employers, accountants, lawyers, referees, banks, landlords, guarantors, financial advisors;
- third parties you may have had dealings with;
- Credit Reporters;
- Credit Reporters and identification service providers for identification information;
- publicly available information;
- insurers;
- your executors, administrators or persons holding authority to act on your behalf;
- our service providers like debt collection agencies, introducers, professional advisers, direct debit companies, private investigators;
- professional organisations;
- public and subscribed databases;
- any persons considered necessary to carry out your instructions; and
- government authorities.

Purposes for which we may collect, use, disclose and hold your personal information

We may use your personal information for the following purposes:

- Responding to queries.
- Providing you with information about us.
- Providing you with our services, as requested by you.

- Making a decision to provide you with our services or provide you with information about the services we provide, including evaluating your creditworthiness.
- Verifying your identity, and carrying out credit and other checks, for the purpose of registering you as a Borrower or as an Investor.
- Managing the products and services we provide.
- Managing your scheduled repayments and one off payments with direct debit companies.
- Preventing and defending instances of fraud, unlawful conduct, and other risks to our products and services
- Internal and external dispute resolution.
- Enforcing our rights including debt collection, where necessary instituting legal action, and assigning debts to third parties.
- Undertaking securitisation activities and other activities relating to funding and capital requirements.
- Providing your personal information when requested by our funders and Investors.
- Enabling our associated entities and other selected entities to promote their products and services to you.
- Ensuring that we comply with relevant legislation and regulations in providing any services to you or providing you with access to any services that we provide.
- Any specific purpose which we notify you of at the time personal information is collected.
- Marketing products and services provided by us, our related entities and third parties we have dealings with.

- Compiling statistical data for example credit scoring information.
- Complying with specific New Zealand laws that make it mandatory for us to collect your personal information which is necessary for us to comply with our privacy obligations.
- Enabling us to comply with our customer due diligence and other obligations under any anti-money laundering legislation.

We (and our third party service providers) may use, sell, licence, distribute and disclose data which we develop from personal information, provided that such data has been stripped of all personally identifiable information.

Disclosing your information to Third Parties including overseas

Where permitted under the Privacy Act, We may disclose information about you (including your identity) to a third party entity for the following purposes:

- Carrying out credit and identity checks.
- Co-Borrowers – if you have registered as a Borrower and have asked your spouse to register as a co-Borrower, each of you agree and consent to Harmony providing your personal information to the other of you. Harmony will be entitled to accept instructions from either of you (unless requested otherwise) to the access to, use of or amendment to your personal information by Harmony.
- Facilitating debt collection and recovery.
- Conducting legal proceedings or other investigations.
- Providing our services to you.
- Enabling third parties to provide services to us or to you.

- Enabling Investors and prospective Investors to comply with their customer due diligence and other obligations under any anti-money laundering legislation.

Third parties that we may disclose information about you (including your identity) include the following:

- Law enforcement agencies
- Related entities in New Zealand and overseas entities providing services to us such as legal and financial services, market research and data providers and mailing houses and call centre operators in New Zealand and overseas.
- Investors and funders (your personally identifying information will not be provided).
- Suppliers of goods and services who are financed with the proceeds of the loan.
- Assignees or potential assignees or where we act as an agent on behalf of another person.
- Financial institutions such as banks, financial institutions and credit providers.
- Direct debit companies who manage your scheduled and one off repayments
- Insurers, assessors, underwriters, brokers, and other distributors.
- Government and regulatory bodies in New Zealand and overseas.
- Originators involved in debt assignment or securitisation arrangements.
- Entities involved in our business and who acquire an interest in our business.
- Entities that we do business with whose interest we may acquire.

Some of these entities may be located overseas. For example, we may employ service providers in Fiji, India or the Philippines. We require these entities to adhere to our standards of privacy, security and confidentiality.

If you ask us to make a payment to an overseas retailer, (where applicable), we will provide information to those retailers, banks or financial institutions overseas who process these payments. They are not our service providers, and we do not control how they handle your information.

You acknowledge and agree that in addition to potentially obtaining personal information about you from a Credit Reporter, we may disclose your personal information to a Credit Reporter. The personal information about you that we may disclose to a Credit Reporter may include information about your credit accounts (including credit limits and repayment history), credit defaults, credit infringement and credit non-compliance information, and updates of that information from time to time. A Credit Reporter may hold your information on their credit reporting database and use it for providing credit reporting services, including making this information available to other credit providers (or potential credit providers) and other persons who use the Credit Reporter's services and for any other lawful purpose.

Marketing communications

By accepting the terms of this Privacy Policy and providing us with your personal information, you agree to us using that personal information for the purpose of informing you about our products and services, or providing your information to our related entities and third parties we have dealings with to market our products and services or to market their products and services to you.

What are the consequences of you not providing the personal information we require?

If you do not provide us with all of the personal information we have requested from you, we may not be able to complete registration as a Borrower or Investor, and we may be unable to approve your application for a loan or to invest in a loan, or to provide you with any of the services or information you are seeking from us.

How we store personal information

We store personal information electronically and in paper based form. The personal information is kept safe and secure using generally accepted standards of security.

How you can access/amend your personal information

You may access your personal information we hold by emailing us at privacy@harmony.co.nz. We will provide you with a copy of the personal information we keep about you.

You may request that the personal information we hold about you be corrected if it is misleading, inaccurate, incomplete or irrelevant by emailing us at privacy@harmony.co.nz. If we agree that your personal information is to be corrected we will provide you with an amended record of your personal information.

As some of the information we hold about you may be of a sensitive nature, we will need to verify the identity of anyone requesting access to your sensitive personal information.

Any request for information must be as specific as possible so we can accommodate your request. Access will be provided within 30 days of your request.

We can refuse access to your information if:

- Access would be unlawful
- Denying access is required under New Zealand law or an order of a court or tribunal.
- Access would prejudice enforcement action or appropriate action relating to unlawful activity or serious misconduct.

How long we hold personal information

We will keep your personal information only for as long as necessary to achieve the purpose we collected it for and in all cases for such periods as we are required to in order to comply with any relevant legislation and regulations.

Who you can contact for further information

If you have any queries about this Privacy Policy or personal information we have collected please contact us at privacy@harmoney.co.nz or:

- by calling the Harmoney helpdesk on 0800 HARMONEY (427 666 39)
- by writing to Harmoney at the address listed on www.harmoney.co.nz.