

# SBS Verify Privacy Policy

Effective as at 23 October 2018

## Important

- Southland Building Society operates under the brand "SBS Bank". The name of the registered bank is Southland Building Society (referred to as "us" "we" or "our").
- This privacy policy (which can be amended or replaced from time to time) applies to your use of SBS Bank's ID verification mobile application called SBS Verify (the "Mobile App").
- By downloading and/or using the Mobile App, you agree that you (and anyone else using the Mobile App on your mobile device) will comply with this privacy policy and our SBS Verify Terms and Conditions, which are available at: <https://www.sbsbank.co.nz/terms-conditions>.
- Please read this privacy policy carefully. We are happy to explain anything to you that is not clear.

### 1. Our privacy policy

- 1.1 As a registered bank, we know how important it is to keep your information safe and secure. This privacy policy describes the type of information that we will collect about you through the Mobile App, how we will handle your information and who we will or may share your information with.
- 1.2 By using the Mobile App, you confirm that you are authorised to provide us with the personal details and any supporting documents you provide to us through the Mobile App.

### 2. What personal information will we collect?

- 2.1 By using the Mobile App, you agree that we may collect, store and retain:
- a copy of any document you upload to the Mobile App (for example, your New Zealand Driver's Licence, New Zealand Passport or Australian Passport) and any personal information contained in those documents;
  - any personal information you insert in the Mobile App;
  - details of your activity within the Mobile App; and
  - information relating to your mobile device (including your app version, mobile device type, operating system, IP address and security information related to your mobile device).

### 3. Why we collect your personal information

- 3.1 We collect, retain and disclose your personal information in order to electronically verify your identity and address ("**ID Verification**") at the time you use our Mobile App to comply with our legal obligations, including our obligations under the Anti-Money Laundering and Countering Finance of Terrorism Act 2009.
- 3.2 We may also need to re-verify your identity and address from time to time by resubmitting and sharing your personal information as set out below. If you do not want us to do this, please let us know by contacting our Contact Centre

on 0800 727 2265 or contact one of our branches during business hours.

### 4. Who will we share your personal information with?

- 4.1 To complete your ID Verification, the Mobile App uses an electronic verification platform provided by Green ID Limited ("**Green ID**") to match your personal details against official records held with the New Zealand and/or Australian Government (as applicable) and records held within identification databases maintained by select independent third party agencies ("**Third Party Agencies**").
- 4.2 By using the Mobile App, you acknowledge that we will (or may) disclose your personal information to:
- Green ID;
  - Third Party Agencies, including (without limitation):
    - The New Zealand Transport Agency;
    - The New Zealand Ministry of Business Innovation and Employment;
    - Land Information New Zealand;
    - Dun and Bradstreet credit information bureau;
    - New Zealand Automobile Association;
    - New Zealand Department of Internal Affairs;
  - Australian Document Verification Service; and
  - any service providers who assist us to operate the Mobile App (including developing, hosting or maintaining the Mobile App or providing customer support, marketing assistance or analytical services).
- 4.3 You also authorise us to disclose your personal information (including the results of your ID Verification) to our subsidiaries, including Finance Now Limited, Southsure Assurance Limited and Funds Administration New Zealand Limited, where you apply for, or have, a product or service with them to assist them to complete ID Verification on you and comply with their legal obligations, including our obligations under the Anti-Money Laundering and Countering Finance of Terrorism Act 2009

44 You also agree to Third Party Agencies disclosing your personal information to Green ID and us to confirm the results of your ID Verification.

45 Your personal information will only be disclosed to Third Party Agencies to the extent necessary to carry out your ID Verification, where required by law, or as otherwise authorised by you.

### **5. How long will my information be retained for?**

5.1 You acknowledge that your personal information provided through the Mobile App will be retained by us and Green ID:

- we will hold any personal information you have provided us in an encrypted database that can only be accessed by us. We will retain this personal information for 7 years after you cease to be a customer with us to comply with our legal and audit requirements. If your ID Verification is unsuccessful, we will delete your personal information 7 years after ID Verification has been undertaken.
- Green ID will delete your personal information within three months of your ID Verification.

### **6. What are your rights?**

6.1 It is your decision whether you wish to provide your personal information to us via the Mobile App. If you do not consent to us collecting and disclosing your personal information using the Mobile App, you will need to contact us to use an alternative method to complete your ID Verification. You can contact us to discuss the alternative ways to complete your ID Verification by calling our Contact Centre on 0800 727 2265 or contacting one of our branches during business hours.

6.2 We are also happy to provide you with access to or correct any personal information that we hold about you. If you wish to access your personal information, or, if any of the personal information we have is incorrect, please call our Contact Centre on 0800 727 2265 or contact one of our branches during business hours.

### **7. Analytics and External Partners**

7.1 We may promote our products and services through the Mobile App. We may also use external advertising suppliers to promote our products and services through digital channels such as Google, Trade Me and Facebook.

7.2 We may also use Google Analytics service to measure the performance of the Mobile App. This provides us with statistics detailing daily activity on the Mobile App (such as the number of visitors to our Mobile App, the time of the day our customers access the Mobile App, the type of mobile device used to access the Mobile App

and the number of page views). This information is completely anonymous and allows us to provide the optimal experience for users of our Mobile App.

### **8. Links to external websites**

8.1 From time to time, the Mobile App may contain hyperlinks to other internet websites that are not owned or managed by us. We are not responsible for the content of these websites, their privacy policies or the personal information which such websites may collect about you. When you click the hyperlinks to other websites, you should always read their own privacy policies.

### **9. Changes to this privacy policy**

9.1 We may vary this privacy policy and any other terms and conditions applying to the Mobile App.

9.2 You will be given at least 14 days' notice of any variation either by post to your last known address, telephone call, notice in your branch, notice on our website or via the Mobile App.

9.3 We are not obliged to give you advance notice if an immediate change to this privacy policy is deemed necessary for the security of the Mobile App.