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ARROWSMITH FINANCIAL SERVICES

DOCUMENT REFERENCE: POL-12

# Privacy *Policy*

*How Arrowsmith Financial Services collects, uses, stores, and discloses personal information — in compliance with the Privacy Act 2020.*

ISSUED

November 2026

FINANCIAL SERVICE PROVIDER

FSP715071

> ***Regulatory Basis:*** *Privacy Act 2020; Information Privacy Principles 1–13 and 3A (Privacy Amendment Act 2025).*

## 1 Purpose

This policy sets out how Arrowsmith Financial Services collects, uses, stores, and discloses personal information in compliance with the Privacy Act 2020. We collect extensive personal and financial information from clients in order to provide financial advice, and we have a duty to handle that information responsibly.

## 2 Policy Statement

We will only collect personal information that is necessary for our advice service and the other purposes set out in this policy. We will tell clients why we need it, keep it secure, and only use it for those purposes. Clients have the right to access and correct their information at any time.

## 3 What We Collect

### Personal details

Name, date of birth, address, contact information.

### Financial information

Income, assets, debts, existing insurance policies.

### Health information

Medical history relevant to insurance applications.

### Family information

Dependants, relationships, beneficiaries.

### Employment information

Occupation, employer, industry.

## 4 How We Use It

- To assess the client's needs and provide suitable financial advice.
- To apply for insurance products on the client's behalf.
- To maintain accurate client records as required by law.
- To contact clients about their policies, reviews, and claims.
- To send clients occasional emails, such as birthday and policy anniversary messages, which they can unsubscribe from at any time. We can see whether our emails have been opened, and which links in them are clicked.

## 5 Who We Share It With

We only share personal information with:

- **Insurance and investment providers** — to process applications and claims (with client consent). Under IPP 3A (effective 1 May 2026), when we share client information with insurers, each insurer is indirectly collecting that information. We notify clients of this in the Disclosure Statement provided at the start of the advice process, including links to each provider's own privacy statement. This satisfies the IPP 3A notification requirement on behalf of each provider.
- **Adviser CRM** — the client relationship management (CRM) system that holds our client and policy records. Adviser CRM is a New Zealand business. Its system runs on Zoho, and our records are stored in Zoho's data centres in the United States (see "Where Your Information Is Held").
- **The Adviser Platform (TAP)** — our dealer group and CRM provider until our move to Adviser CRM is complete in December 2026. TAP will still hold a copy of our records after that, and we will ask TAP to delete them once the move is complete.
- **IFSO** — if required during a complaint or dispute resolution.
- **The FMA** — if required by law or regulatory request.

- **AI tools** — we use secure software that includes an AI tool, Anthropic's Claude, used under Anthropic's published terms with model training switched off, to help gather, organise and format information and prepare your documents. Your recommendations are made by your adviser, not by the software. With model training switched off, what we put into Claude is not used to train Anthropic's AI models, and we handle it in line with this Privacy Policy. From 20 November 2026, Claude also reads our records in Adviser CRM, and from December it keeps them up to date, making changes such as a policy's status or premium, using our login. Every change it makes is recorded and checked. Adviser CRM's system has an AI feature of its own, which can suggest which of our team should look after a record, based on past records. We do not use it on your information, and we will check any AI feature against our privacy and outsourcing policies before we use it.
- **Other services we use to run our business** — such as email, file storage and e-signing, which may store information outside New Zealand (see "Where Your Information Is Held").

NOTE

We never sell or share client information for marketing purposes.

## 6 Where Your Information Is Held

We hold your information in New Zealand and overseas. Our client and policy records are kept in Adviser CRM, which stores them with Zoho in Zoho's data centres in the United States. Adviser CRM's published terms also name two other providers it uses, Anthropic and API2PDF, both in the United States. Claude, the AI tool named in section 5, is provided by Anthropic, which processes information in the United States and in other countries where its own providers operate. Other services we use, such as email, may also store information outside New Zealand.

Adviser CRM's terms say it handles your information as our agent, to provide its service to us and to keep that service secure, supported and running. They require it to protect information stored overseas in a way comparable to New Zealand law, and to bind any provider it uses to the same protections. They also let Adviser CRM use our records to produce anonymised, combined statistics that do not identify anyone, and to share those statistics with others, even after we stop using it. We use Claude under Anthropic's published terms, under which Anthropic, not us, decides how the information it receives is used: it uses it to provide the service, and also for the safety, security and legal purposes its privacy policy sets out. Overseas providers may not be bound by New Zealand privacy law. We keep a record of each provider we use, and we remain responsible for your information under the Privacy Act 2020.

Our CRM holds personal and sensitive information about you. This includes health details, such as your medical history, whether you smoke, any exclusion or loading on your policy and the details of any claim, and, where we hold them, your IRD number and notes about any extra support you need. We protect it: Max and Tim each have their own login to our CRM, protected by two-step verification before any client information is loaded, and records are private by default. Adviser CRM's own staff may also access our records where they need to in order to provide its service to us, such as loading our data and giving support, as its terms allow. We also keep our own copy of our CRM records, taken each working day (see "How Long We Keep Your Information").

## 7 How Long We Keep Your Information

We keep advice records for at least 7 years after the advice was given or the policy ended, whichever is later. After that, unless there is a reason to keep them, we delete them from our CRM. A deleted record stays in the CRM's recycle bin for 60 days, and the CRM's record of each step a policy or a piece of advice has been through (for example, from application to in force) cannot be deleted. Our own client files are kept for at least 7 years. The daily copies of our CRM records that we keep on our own systems are deleted within about 16 months, and our record of each change we make to our CRM is kept for at least 7 years, as our advice records are. If we stop using Adviser CRM, we can ask it for a copy of our records and to delete them, and it deletes its own backups 90 days after the service ends.

## 8 Client Rights

### I

**Right to know**

Right to know what information we hold about them.

### II

**Right to a copy**

Right to request a copy of their information.

### III

**Right to correct**

Right to request correction of inaccurate information.

### IV

**Right to withdraw**

Right to withdraw consent for future use (noting this may affect our ability to provide advice).

## 9 Privacy Breaches

A notifiable privacy breach is one that is likely to cause serious harm. If a breach occurs, we will notify the Privacy Commissioner and affected individuals as soon as practicable after becoming aware of the breach, as required by the Privacy Act 2020 (s 114). All breaches are logged in the Incident Register. See Cyber Security Policy (POL-10) for incident response procedures.

## 10 Controls

- Annual privacy review of data collection and storage practices.
- Privacy training completed annually by all staff, documented in Training Records.
- Client access requests tracked and resolved within 20 working days.
- Privacy breach response tested annually as part of incident response drill.

## 11 Contact

If you have any questions about this policy, want to access or correct your information, or have a concern about how we have handled your data, please contact us using the details below. Clients may also make a complaint directly to the **Office of the Privacy Commissioner** (privacy.org.nz).

CONTACT DETAILS

# Arrowsmith Financial *Services*

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