



## PRIVACY POLICY

### INTRODUCTION

Roberts Evans & Zhou Ltd (“we”, “us”, “our”) complies with the Privacy Act 2020 when dealing with personal information. Personal information is information about an identifiable individual (a natural person).

We are committed to ensuring that all personal information entrusted to us is held in strict confidence, and is only used and disclosed in accordance with this policy and applicable law.

This policy sets out how we collect, use, disclose, store and protect your personal information.

This policy does not limit or exclude any of your rights under the Act. Further information is available at [www.privacy.org.nz](http://www.privacy.org.nz).

### TYPES OF PERSONAL INFORMATION

For the purposes of our engagement and to comply with applicable legal and regulatory requirements, we may collect personal information including:

- Full legal name
- Date of birth
- Contact details (residential and postal address, telephone numbers, email addresses)
- Identity verification information (e.g. passport or driver licence details)
- Proof of residential address (e.g. utility bills, bank statements)
- Financial information, including source of funds
- Any other information required by applicable legislation

### WHO WE COLLECT YOUR PERSONAL INFORMATION FROM

We collect personal information about you from:

- You directly, including via telephone, email, online systems, or in person
- Third parties where you have authorised this, or where the information is publicly available or otherwise lawfully obtainable

Where possible, we will collect personal information directly from you.

### HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

Your personal information is stored on secure systems including:

- Internal domain servers (with daily cloud-based backups)
- Cloud-based platforms such as Microsoft 365 and Xero
- Legacy systems such as MYOB (being phased out)



We implement reasonable technical and organisational safeguards, including:

- Two-factor authentication (2FA) for system access
- Managed IT security services provided by an external specialist provider
- Secure network and access controls

Access to personal information is restricted to staff who require it for the performance of their duties.

**Sensitive information, including identity verification (AML) documentation, is subject to additional internal restrictions and may only be accessed and handled by authorised personnel.**

## HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for purposes including:

- Providing professional services to you
- Responding to your requests and communications
- Maintaining client relationships
- Verifying your identity in accordance with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009
- Communicating with government agencies such as Inland Revenue and ACC on your behalf
- Administrative purposes, including billing and internal management
- Improving our services
- Keeping you informed of relevant services and legislative developments
- Any other purpose authorised by you or permitted by law

If you choose not to provide required personal information, we may be unable to provide services to you.

## IDENTITY VERIFICATION (AML) PROCESS

To comply with legal obligations, we as a standard rule verify your identity using a third-party provider, being Verifi Identity Services Ltd, which is a subsidiary of GBG Group Plc, collectively referred to as GBG.

- You may be asked to provide your personal information directly into a secure electronic verification system
- We do not routinely collect or process identity verification data manually
- Verification results are securely stored within our systems
- Access to such information is restricted to authorised personnel only

In the event, that this is not feasible, we will require that you provide us with a certified copy of your identity document (passport or drivers licence) and certified copy of utility bill, which must not be older than 3 months. We will advise you of exact wording for certification purposes. We may also arrange for teams or zoom video call to confirm that the identity documents provided are for yourself. This substitutes the biometric feature that is available using the third party provider GBG.



GBG operates under its own privacy policies, which are available on its website. Please refer to external links ( below)

## DISCLOSURE OF PERSONAL INFORMATION

We will not disclose your personal information to third parties except:

- Where disclosure is **required or permitted by law**; or
- Where you have provided **express or implied authorisation**

This may include disclosure to:

- Inland Revenue Department
- ACC
- Regulatory authorities or law enforcement agencies
- Our identity verification provider (GBG Group Plc)
- Professional advisers or service providers engaged to support our services
- Any other party authorised by you or by law

Where possible, we will only disclose information that is necessary for the relevant purpose.

## CROSS-BORDER DISCLOSURE

Some of our service providers and systems may store or process personal information outside New Zealand, including in Australia and other jurisdictions.

Where this occurs, we take reasonable steps to ensure that:

- The recipient is subject to privacy protections comparable to those under New Zealand law;
- The disclosure is otherwise permitted under applicable law

We will only transfer personal information overseas where it is lawful and appropriate to do so.

## DATA BREACHES

We take data security seriously. In the event of a privacy breach:

- We will take immediate steps to contain and assess the breach
- Where required, we will notify affected individuals and the Privacy Commissioner in accordance with the Privacy Act 2020
- We will take steps to prevent recurrence

## ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

Subject to certain grounds for refusal under the Act, you have the right to access and request correction of your personal information. To make a request, please email: [reception@reztax.co.nz](mailto:reception@reztax.co.nz)



We may require proof of identity before processing your request.

We may charge reasonable costs for providing copies or making corrections where permitted.

### USE OF INTERNET AND EMAIL

While we take reasonable steps to maintain secure systems, the transmission of information over the internet is not completely secure and is at your own risk.

Where you access third-party websites via links, those sites will have their own privacy policies.

### CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time.

### EXTERNAL LINKS

For further information on identity verification provider policies:

- GBG Group Plc – Privacy and Data Retention Policies [Privacy Policy | GBG NZ](#)