

## ISL PRIVACY POLICY FOR MOBILE APPLICATIONS

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This Privacy Policy applies to personal information collected by Innovative Securities Ltd. ("Innovative Securities") and sets out how Innovative Securities collects, stores and uses your personal information and how you can access and update your personal information or make a complaint.

Unless otherwise notified to you that your personal information will be used in a more limited way (for example, in a mobile application or form seeking personal information from you), all personal information collected by Innovative Securities is held and used in accordance with this Privacy Policy. Innovative Securities has a developed PIM to ensure that personal information is handled appropriately, to meet our internal and all legal requirements.

Innovative Securities understands that the confidentiality, integrity, and availability of our members' information are vital to their business operations and our own success. We use a multi-layered approach to protect key information by constantly monitoring and improving our applications, systems, website, and processes to meet the growing demands and challenges of dynamic security threats. In recognition of our security efforts, Innovative Securities has received ISO 27001 security standards registration.

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### 1. How personal information is collected

This Privacy Policy applies to personal information of individuals that Innovative Securities collects via the following:

*Innovative Securities mobile application* – any consumer-directed mobile application operated by Innovative Securities, including our smartphone application (e.g., Android application or iOS application).

*Data from third parties* – Innovative Securities generally only collects personal information directly from individuals. We do not collect personal information about our customers and partners from third parties.

You may decide not to provide your personal information to Innovative Securities. Please note that in such case, we may not be able to provide you with the services or with the access to certain information you seek.

### 2. Kinds of personal information held by Innovative Securities

Innovative Securities only collects personal information that is necessary for one or more of its business functions. We may combine personal information that we collect via one method (e.g., a mobile application) with personal information that we collect via another method (e.g., a website). We do this to ensure privacy of our customers. Personal information collected includes the following:

*Technological device information* – We collect specifically information about a technological device (e.g., a smartphone) that you may be using to access our application. The specifically information that we collecting may be device brand, device code, device name, device model, and operational system version.

By continuing to use this application you authorise Innovative Securities to collect, store, use, and disclose your personal information in the manner set out in this Privacy Policy.

### 3. Children's privacy

Innovative Securities considers a child to be anyone under the age of 18. We do not knowingly seek or collect personal information from or about children. If we discover that we've accidentally collected

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information from a child, we will remove that child's information from our records as soon as feasibly possible.

### 4. The purposes for which personal information is collected

To provide you with our services, Innovative Securities may collect and use your personal information for some or all of the following purposes. Please note that not all of the uses below will be relevant to every individual.

Account maintenance - We may collect and use your personal information to maintain your accounts with us, including administering that are associated with your account.

Consumer/customer service - We may collect and use your personal information to provide you with customer service, including responses to your inquiries, complaints and general feedback about our products. Customer service may be provided through various forms of communication, including via email, letter, and telephone.

Product improvement and customisation - We may collect and use your personal information so we can constantly improve our products, tailor them to your needs, and come up with new product ideas and inform you of any changes to our products.

Other general purposes (e.g., security, internal research, surveys) - We may collect and use your personal information for other general business purposes, such as to maintain the day-to-day operation and security of our website and application.

### 5. Disclosure of personal information

Innovative Securities will not share, sell, trade, rent or otherwise disclose information about you to third parties unless we have specifically informed you and you have given us specific permission to do this.

However, there are exceptions and we may share your personal information with third parties, but only in the following circumstances:

Service Providers, Agents and Contractors - We may use third parties, like service providers, agents or contractors to provide support for our business functions (such as internal operations of our websites and applications, database or website hosting). Your personal information may be accessed by service providers located in New Zealand or overseas or be stored by them in New Zealand or overseas.

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Legal requirements – We may disclose your personal information if we are required to do so by law, or if in our good faith judgment, such action is reasonably necessary to comply with legal processes, to respond to any claims, or to protect the safety or rights of Innovative Securities, its customers, or if the source of the information is publicly available, or if you authorized us to do so.

Business transfers – In the event of a merger or acquisition of all or part of Innovative Securities by another company, or in the event that Innovative Securities were to sell or dispose of all or a part of the Innovative Securities business, the acquirer would have access to the information maintained by that Innovative Securities business, which could include personal information.

### 6. Data storage and security

We take all reasonable technical and organisational measures to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse. The ways we do this, include:

Using Secure Sockets Layer (SSL) encryption when collecting or transferring information (SSL encryption is designed to make the data unreadable by anyone but us);

Limiting physical access to our premises;

Limiting access to the information we collect about you for instance, only those of our personnel who need your information to carry out our business activities are allowed access;

Putting in place physical, electronic, and procedural safeguards in line with industry standards, we will only keep your personal information for as long as it is reasonably necessary taking into consideration our need to answer queries or resolve problems, provide improved and new services and comply with legal requirements under applicable laws.

We hold your personal information only as long as necessary. This means that we may retain your personal information for a reasonable period after you terminated using Innovative Securities services or stop using our application. When the personal information that we collect is no longer required, we destroy or delete it in a secure manner, in accordance with best practice for document and data destruction.

We hold your personal information in:

Computer systems;

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### Electronic databases;

### Digital archives.

These storage mechanisms may be managed in a number of ways. These may be managed or administered internally by Innovative Securities and may be held by a third party contracted by us for storage services in New Zealand or overseas.

Third party data security – Where Innovative Securities does disclose personal information to a third party as specified in point 4 above, any such third party must at all times provide the same levels of security for your personal information as Innovative Securities does, and, where required, are bound by a legal agreement to keep your personal information private, secure and to process it only on the specific instructions of Innovative Securities.

We do not assign unique identifiers to your personal information unless it is necessary to provide you with the requested services.

ISO 27001 registration – Innovative Securities has been assessed and certified as meeting the requirements of ISO/IEC 27001:2013 for the following activities – security of information is handled in course of fund management, portfolio management, customer account and securities account management.

## 7. How you may access your personal information and seek its correction

Prior to any use of your personal information Innovative Securities checks its accuracy and compliance with the details you have provided to us. To ensure that your personal information ISL holds is at all times current, please notify us of any changes as soon as possible.

You can request access to the personal information Innovative Securities holds about you by contacting the Innovative Securities at any of the following methods [here](#). If Innovative Securities cannot provide access to your personal information, it will provide you with the reasons why. Depending on the nature of the request, Innovative Securities may charge for providing access to your personal information, however such charge will not be excessive.

If the personal information Innovative Securities holds about you is inaccurate, incomplete or not up to date you may request that Innovative Securities correct the information [here](#). The Client has rights to access and correct any information held by Innovative Securities in respect of the Client. Where

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available, you can review or update any personal information that we may have collected about you for our general website and application registration. To do this, please contact us.

### 8. Cookies

Innovative Securities application does not use tracking technologies, such as "cookies" and "web beacons". For us your privacy is important.

### 9. Links to other sites

Innovative Securities application does not contain links to other websites that are not operated by Innovative Securities.

### 10. List of the privacy laws and initiatives that we are comply with

We are a New Zealand company registered in New Zealand and governed by New Zealand law. We comply with New Zealand's Privacy Act 1993 both in letter and in spirit, and uphold the privacy protection principles. That means we take care to keep any personal information we hold confidential, complete and accurate, and we try not to collect any more information than we need for our legitimate business purposes nor do we keep it longer than necessary. We comply with other laws relating to information security and of course applicable laws and regulations relating to corporate governance, financial control and so forth.

### 11. How to make a complaint and how complaints will be handled

If you are concerned about a possible interference with your privacy or misuse of your personal information by Innovative Securities, please contact the Innovative Securities at any of the following methods [here](#).

Your complaint will be sent to ISL privacy officer. It is Innovative Securities policy to handle complaints in a timely, effective, fair and consistent manner. On making a privacy complaint to Innovative Securities, you will receive an acknowledgment letter or email within 5 business days. This

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communication will set out by our privacy officer, you will receive the name of the person and the expected response time to the complaint. Innovative Securities endeavours to make a decision on all written complaints within 20 business days after a complaint is received. If we need more time to respond to your complaint we will notify you as to the delay, the reasons for it and seek your agreement to a longer period.

If you are not satisfied with Innovative Securities response you can contact the Office of the Privacy Commissioner at <https://privacy.org.nz/>.

## 12. Glossary

While we try our best to use plain and simple language, we recognise that there will be some jargon. This section aims to provide simple definitions for some of the common privacy terminology.

***Applicable law*** The legislation with which any personal information processing must comply.

***Cookies*** These are small pieces of data that are placed on your device (e.g. your browser when you access a website). Cookies are used for a variety of purposes, including enabling features on a website, helping us to understand which parts of our websites are the most popular, where website visitors are going, and how much time they spend there.

***Encryption*** Encryption, such as Secure Sockets Layer (SSL) encryption, is a system for protecting data, used when collecting or transferring sensitive data, such as credit card details or other personal information. Encryption is designed to make the data unreadable by anyone but the intended recipients.

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**Personal Information** means information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Examples include name, address, phone number, email address, technological device information, hobbies, usage patterns, family members and income.

**Personal Information Management** or PIM, is the set of processes and controls used to ensure that personal information is handled appropriately, to meet our internal and legal requirements.

**Privacy Act** means the *Privacy Act 1993* (New Zealand).

**Privacy policy** is a statement or a legal document that discloses how a company gathers, uses, discloses and manages the personal information provided by an individual (such as a customer, partner, employee or potential employee). While this is a legal document, a privacy policy aims to provide transparency about these information handling practices, so should ideally be written in clear and simple language.

**Technological device** is a machine designed for a purpose. In a general context, a smartphone can be considered a device.

**Third parties** These are non-Innovative Securities companies contracted to perform functions on our behalf, such as fulfilling orders, delivering packages, sending postal mail and e-mails, sending text messages (SMS), providing marketing assistance, etc.

**Unsubscribe link** If you would like to unsubscribe from an email sent to you, follow the 'unsubscribe' link and/or instructions placed (typically) at the bottom of the mail. If you use more than one e-mail address to shop or contact us, you need to unsubscribe from each e-mail account that you use.

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**Web Beacons**

Web beacons, also known as single pixel or clear gif technology, or action tags, tells us which visitors clicked on key elements (such as links or graphics) on the Innovative Securities web page or email.

13. Review

This Policy is reviewed annually.