

## Privacy Policy

Welcome to Initial Money Limited (“we,” “us,” or “our”), and thank you for visiting our website. We are dedicated to safeguarding the privacy of our users, and this Privacy Policy outlines how we collect, use, and protect your personal information when you interact with our website, products, and services. Using our website, you consent to the practices described in this Privacy Policy. If you disagree with the terms of this Privacy Policy, please do not use our website, or provide us with your personal information.

### Your authorization

If you provide us with personal information or employ us to perform services on your behalf, you agree that it will be collected, used, kept, and disclosed by this privacy policy.

### 1. Information We Collect

We collect various types of information, including personal and non-personal data, which may be obtained directly from you or automatically while you use our services.

#### A. Personal Information:

We may collect the following personal information:

- Contact Information: Such as your name, email address, phone number, postal address, and other identifiers.
- Financial Information: Such as information related to your financial situation, income, expenses, and credit history.
- Identification Information: Such as government-issued ID numbers, social security numbers, and passport information.
- Account Information: Such as usernames, passwords, and security questions and answers.
- Transaction Information: Such as records of transactions you have made with us or through our services.
- Communication Information: Such as records of your interactions with us, including emails, chat logs, and customer support inquiries.

#### B. Automatically Collected Information:

- When you access our website, we may automatically collect certain non-personal information, which includes:
- Device Information: Such as your IP address, browser type, operating system, and device characteristics.
- Usage Information: Such as your browsing behavior, pages viewed, links clicked, and other actions taken on our website.
- Cookies and Similar Technologies: We use cookies and other tracking technologies to collect information about your online activity. You can manage your cookie preferences through your browser settings.

### 2. How We Use Your Information

We use your information for various purposes, including:

- Providing Services: To deliver the products, services, and information you request, and to process and manage transactions.
- Communication: To respond to your inquiries, provide customer support, and send administrative information.
- Marketing: To send you marketing communications and newsletters, provided you have given your consent or where otherwise permitted by law.
- Legal Obligations: To comply with legal obligations, such as tax reporting and anti-money laundering (AML) requirements.
- Improving Our Services: To analyse and enhance the quality and effectiveness of our services, including personalizing your experience.

### 3. Updating your personal information

- In general, we will depend on you to make sure the data we have on you is correct. Kindly promptly notify us by contacting us if any of your details change.

### 4. Sharing Your Information

We may share your personal information in the following ways:

- With Third Parties: We may share your information with third-party service providers, partners, and financial institutions as necessary to provide our services and perform certain business functions.
- Legal Compliance: To comply with legal obligations, including responding to lawful requests and court orders.
- With Your Consent: We may share your information when you give us your explicit consent.

### 5. Security Measures

We take the security of your information seriously. We implement reasonable administrative, technical, and physical measures to protect your data against unauthorized access, disclosure, and alteration.

However, please be aware that no method of transmission or storage over the Internet is entirely secure, and we cannot guarantee the absolute security of your information.

### 6. Your Choices

You have rights regarding your personal information:

- Access and Correction: You can access and correct your personal information by contacting us.
- Marketing Communications: You can opt out of marketing communications at any time.
- Data Deletion: You can request the deletion of your data, subject to applicable laws and legitimate business needs.

### 7. Cookies and Tracking Technologies

Our website may use cookies and similar tracking technologies. You can control your cookie preferences through your browser settings.

### 8. Changes to this Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices, or for other operational, legal, or regulatory reasons. We will post the updated Privacy Policy on our website with the revised date.

### 9. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal information, please contact us at [info@initialmoney.co.nz](mailto:info@initialmoney.co.nz) or call us on 022 322 0800.

This Privacy Policy was last updated on January 2024.