Privacy Statement

Introduction

When a client uses our services, they are trusting Yes Life Limited with their personal and financial information. We understand this is a big responsibility and work hard to protect their information as per the Privacy Act 2020.

Key Processes

Yes Life Limited collects personal information from:

- Prospective Employees
- Contractors
- Outsource Providers
- Clients and Prospective Clients

- We will only collect information that is directly relevant to our business relationship with our clients.
- The primary source of information will be from the client directly. Where we use other sources, we must inform the client of those sources before proceeding.
- We will not share, sell or trade personal information to any other company or person. We may contact clients from time to time for relationship management purposes or to advise of other services.
- We will use all reasonable endeavours to ensure that personal information is kept secure and confidential.
- Only authorized staff will have access to personal information.
- We only keep personal information for as long as it is necessary (refer record Keeping policy)
- Client information is safely disposed of.
- We ensure that our IT network is secure.
- We take all reasonable steps to ensure information is protected when working remotely
- If we are considering engaging an overseas-based service provider (e.g. cloud storage services), we must ensure that the provider meets all New Zealand privacy laws.
- Any requests for access to information must be referred to the Privacy / Compliance Officer
- We record breaches on the Breaches register

Your Authorization

By providing us with personal information, engaging us to provide you with services, or by using our website, you consent to the collection, use, storage and disclosure of personal information in accordance with this Privacy Policy.

Collect Your Information

Collection of your Information We may collect personal information about you when you provide information to us directly, and when you obtain services from us. We may also collect personal information about you from third parties where authorized by you and from public sources. The type of personal information we may collect may include: your contact details: name, address, phone number, email documents that confirm your identity: your driver's license, passport etc. other information relevant to the service we will provide to you.

Use of Your Information

We only collect and use personal information from you to be able to provide you with the products and services you have requested from us. We may provide you with information on our other services from time to time. We do not sell our client information or share it with third parties without your permission.

Life is short,and it is here to be lived.

Yes Life Limited's 10 Principles

Principal 1

Personal information must only be collected when: The collection is for a lawful purpose, connected with what Yes Life Limited does, and it's necessary to collect the information for that purpose.

Principal 2

Personal information must usually be collected from the person the information is about. But sometimes it is all right to collect information from other people instead - for instance, when: getting it from the person concerned would undermine the purpose of the collection, it's necessary so a public sector body can uphold or enforce the law, the person concerned authorizes collection from someone else.

Principal 3

Principle 3 requires organisations to be open about why they are collecting personal information and what they will do with it when collecting it from the person directly. This principle is about helping people understand the reasons you are collecting their information.

When an organisation collects personal information directly, it must take reasonable steps to make sure that the person knows:

- why it's being collected
- who will receive it
- whether giving it is compulsory or voluntary
- what will happen if the information isn't provided.

Sometimes there may be good reasons for not letting a person know about the collection – for example, if it would undermine the purpose of the collection to protect law enforcement investigations, or it's just not possible to tell the person.

Principal 3A

Principle 3A means that if an agency collects someone's personal information indirectly, that agency is required to notify them, unless one of the listed exceptions applies. This principle is about helping people understand the reasons you are collecting their information.

Collecting personal information indirectly means that the agency collects the personal information from someone other than the person themself.

The obligation to inform the individual sits with the agency that collects the information indirectly.

Before your agency collects personal information indirectly, you still need to assess whether you have a proper basis to do so under IPP2. Agencies should be collecting personal information from an individual directly, unless an exception under IPP2(2) applies.

When an organization collects personal information indirectly, it must take reasonable steps to make sure that the person knows:

- That the information has been collected.
- The purpose of the collection.
- The intended recipients of the information.
- The name and address of the agency that is collecting information and the agency that holds the information.

- If the collection is authorized or required by law, which particular law that is.
- Their right to access and correct their information.

There are a number of exceptions to this principle, such as if the individual has already been made aware of the indirect collection, or that the information won't be used in a way that identifies people. Read the exceptions to this principle including explanations and examples.

Principal 4

Personal information must not be collected by unlawful means or by means that are unfair or unreasonably intrusive in the circumstances.

It's impossible to stop all mistakes. But we must ensure that there are reasonable safeguards in place to prevent loss, misuse, or disclosure of personal information.

Principal 5

People are entitled to receive from Yes Life Limited upon request;

- Confirmation of whether Yes Life Limited holds any personal information about them, and;
- Access to their personal information if a person is given access to personal information, they must be advised that under Principle 7, they may request the correction of that information.

There are situations where we can refuse to give access to information because doing so would:

- Endanger a person's safety.
- Prevent detection and investigation of criminal offences.
- Involve an unwarranted breach of someone else's privacy.

Yes Life Limited has a legal duty to respond to requests for access to information or correction of information within 20 working days of receiving the request.

Principal 6

People have a right to ask us to correct information about themselves, if they think it is wrong;

- Yes Life Limited must on request take reasonable steps to ensure the information is accurate, up to date, complete and not misleading.
- When people are requesting the correction of personal information, they are entitled to provide a

statement of correction and request it is added to file.
- Yes Life Limited must take all reasonable and practical steps to inform every other person that information has been disclosed to that there has been a change.

Principal 7

Before we use or disclose personal information, we must take reasonable steps to check that information is accurate, complete, relevant, up to date and not misleading.

We must not keep information for longer than is necessary for the purposes for which the information may be lawfully used.

We must use personal information only for the purpose of which it has been collected. Other uses are occasionally permitted (for example, because it is necessary to enforce the law, or the use is directly related to the purpose for which the agency got the information.

Principal 8

We can only disclose personal information in limited circumstances, such as where another law requires us to disclose the information. We can also disclose information if we reasonably believe that:
- Disclosure is one of the purposes for which we got the information
- Disclosure is necessary to uphold or enforce the law
- Disclosure is necessary for court proceedings
- The person concerned authorized the disclosure
- The information is going to be used in a form that does not identify the person concerned.

Principal 9

Where disclosure of personal information happens outside of New Zealand (ie. where the third-party provider is based overseas), we must confirm that the providers meets the New Zealand privacy and data laws before entering into a business relationship with them. If they do not meet our criteria, we cannot allow them to hold our data.

Principal 10

Yes Life Limited cannot use the unique identifier given to a person by another business. For example, some business or agencies give people a 'unique identifier' instead of using their name (eg. a driver's license number, a student ID number, an IRD number, etc). People are not required to disclose their unique identifier unless this is one of the purposes for which the unique identifier was set up, or is directly related to those purposes.

Changes to our Privacy Policy

We may change our Privacy Policy from time to time, by publishing an updated version on this page, to reflect changes in the law and also our business needs so long as the changes do not disadvantage you. By continuing to engage us or use our website you will be deemed to have accepted the updated Privacy Policy.

Security

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Where is information hosted?

Our website and customer relationship management systems are hosted in New Zealand. We also use Microsoft 365m CRM System which are hosted in the USA and are compliant with the General Data Protection Regulations (GDPR). When we share your data with a third party, we have contracts in place with them which requires them to have in place the technical and organizational measures necessary to protect your personal data, however many such providers are subject to different privacy laws and controls to New Zealand and hence we cannot provide absolute surety that those providers will not comply with their obligations to us, and divulge your personal data.

Breach process

These are four key steps in dealing with a privacy breach:

1. *Contain:* Once you discover a privacy breach, contain it immediately and find out what went wrong
2. *Assess*: Assessing the risks of the privacy breach will help figure out our next steps
3. *Notify:* We will be open and transparent with people about how we are handling their personal information
4. *Prevent:* The most effective way to prevent future breaches is through our security plan for all personal information

Further information about the four steps, follow

https://www.privacy.org.nz/privacy-for-agencies/privacy-breaches/responding-to-privacy-breaches/

If we are unsure if a breach is notifiable, we can refer to the commission's website
https://www.privacy.org.nz/privacy-for-agencies/privacy-breaches/notify-us/

Access and correction to your personal information

You may access and request correction of any of the personal information that we hold about you at any time by contacting us. We may charge a fee for our reasonable costs of retrieving and supplying the information to you.

Declaration

I hereby acknowledge, understand and give consent to my personal information being accessible, gathered, collected and used for the purposes of the above until I choose to withdraw my consent in writing by emailing service@yeslife.co.nz. I actively give consent to my personal information being used by us and third parties for their own purposes as described above acknowledging that this may involve my personal information being accessible, held, analyzed, collated, worked on for administration and or IT Purposes by overseas entities in countries such as but not limited to Philippines that may not have the same compliance obligations and may not be required to protect my information in a way that overall provides comparable safeguards as to what the New Zealand Privacy Act 2020 provisions provide. I indemnify Yes Life, from any dissemination, liability or damages occurred, perceived or otherwise.

Name:	Signature:	Date:
Name:	Signature:	Date: