



Our Privacy Policy

Hatton Financial Services – FSP 713591

Last updated: 1st August 2026 v3.5

Introduction

This Privacy Policy explains how Hatton Financial Services (we, us, our) collects, uses, discloses, stores, and protects personal information.

We comply with the Privacy Act 2020 (the Act) when handling personal information. Personal information is information about an identifiable individual (a natural person).

You are not required to provide the personal information that we request. However, if you choose not to provide that information, in many cases we may not be able to provide our services to you.

Privacy Officer

We have appointed a Privacy Officer, being Theresa Hatton – Director & Financial Adviser.

The Privacy Officer is responsible for:

- understanding the privacy principles under the Privacy Act 2020;
- working to ensure the organisation complies with the Act;
- dealing with complaints from clients about possible privacy breaches;
- responding to requests for access to, or correction of, personal information; and
- acting as our liaison with the Office of the Privacy Commissioner.

The Privacy Officer may also:

- train staff on privacy matters;
- advise on compliance with privacy obligations;
- assess privacy impacts of changes to business practices; and
- recommend improvements to privacy practices.

The Privacy Officer will complete appropriate training through the Office of the Privacy Commissioner.

How we collect personal information

We collect personal information directly from individuals when they interact with us, including through meetings, communications (such as email or phone), completion of forms, use of our website, and when we provide financial advice and related services.

We also collect personal information from third parties where it is necessary to provide our services or meet our legal and regulatory obligations. This may include information obtained from:

- clients' related businesses;
- accountants and other professional advisers;
- product or platform providers (including insurers and investment & KiwiSaver providers);

- employers or employer schemes;
- medical service providers (where relevant to insurance advice); and
- publicly available sources.

We may also collect or generate personal information through service providers that assist with advice delivery, compliance, identity verification, record-keeping, and administration.

When you visit our website, we may collect information relating to website usage, such as traffic data, location data, and analytics.

Personal information is retained in accordance with our record-keeping obligations and internal policies.

Collection of personal information from third parties (IPP3A)

In some circumstances, we collect personal information about you indirectly, rather than directly from you. This may occur where collecting the information directly is not reasonable or practical, or where information is provided to us in the ordinary course of providing financial advice services.

- Personal information may be collected indirectly from:
- product or platform providers (such as insurers, KiwiSaver providers, and fund managers);
- another financial adviser or referral partner;
- employer schemes or group arrangements;
- publicly available sources; or
- service providers that support our advice, compliance, administration, or identity-verification functions.

Where personal information is collected indirectly, it is collected for the purpose of providing financial advice services to you, meeting our legal, regulatory, and professional obligations, and supporting the administration, review, and ongoing management of your financial arrangements.

Where required under the Privacy Act 2020, including the requirements of Information Privacy Principle 3A (IPP3A), we take reasonable steps to notify you that information has been collected, the purpose of collection, and your rights of access and correction, unless an exception applies.

How we use personal information

We collect and use personal information for the following purposes:

- to provide, manage, and improve our financial advice and related services;
- to respond to communications from clients;
- to contact clients about matters we believe may be relevant or of interest;
- to assess eligibility for financial products and services;
- to comply with our legal and regulatory obligations, including engagement with the Financial Markets Authority (FMA);
- to protect or enforce our legal rights and interests, including in relation to complaints or claims;
- to conduct research and statistical analysis on an anonymised basis;
- to undertake identity verification and other checks where required by law; and
- for any other purpose authorised by you or permitted by the Act.

Who we disclose personal information to

We may disclose personal information to:

- financial product and platform providers (including insurers and investment & KiwiSaver providers);
- businesses and service providers that support the provision of our services (including IT providers, CRM systems, and administrative support);
- professional advisers such as lawyers and accountants;
- regulatory bodies, including the Financial Markets Authority;

- third parties where required to obtain information necessary to provide our services;
- any person authorised by you; and
- any other person as permitted or required by the Privacy Act 2020 or other applicable laws.

Third-party service providers and overseas storage

We may disclose personal information to third-party service providers who support our business operations. This includes providers of:

- information technology services;
- customer relationship management systems;
- document and data storage services;
- compliance, audit, and verification services; and
- professional advisory services.

Some of these providers may store or process personal information outside New Zealand. Where this occurs, we take reasonable steps to ensure that your information is protected in a manner consistent with the Privacy Act 2020, including through appropriate contractual and security safeguards.

Use of artificial intelligence (AI) and automated tools

We may use approved artificial intelligence (AI) and automated tools to support certain business and administrative functions, such as document drafting, research assistance, summarisation, data organisation, and workflow efficiency.

These tools are used to assist our processes only and do not replace professional judgement. All financial advice is reviewed and provided by a qualified human adviser and tailored to your individual circumstances.

We do not use AI tools to make automated decisions about individuals.

Personal information is only used within such tools where appropriate safeguards are in place and where such use is consistent with our obligations under the Privacy Act 2020.

How we protect personal information

We take reasonable steps to protect personal information from loss and from unauthorised access, use, modification, or disclosure.

We maintain internal policies and controls, including:

- secure electronic systems with access controls;
- physical security measures for paper records;
- staff confidentiality obligations; and
- data protection and information security policies.

Retention of personal information

We retain personal information for as long as necessary to provide our services and meet our legal and regulatory obligations.

In most cases, this means retaining information for at least 7 years after our relationship with you ends. After this period, your information is not deleted but is securely archived within our database. Archived information is retained indefinitely and is only accessed where necessary for legal, regulatory, or legitimate business purposes.

Accessing and correcting personal information

Subject to the grounds for refusal set out in the Privacy Act 2020, you have the right to request access to personal information that we hold about you and to request correction of that information.

Internet use

While we take reasonable steps to maintain secure internet connections, personal information provided over the internet is provided at your own risk.

If you follow a link from our website to another site, that site will have its own privacy policy. We recommend reviewing those policies before providing personal information.

Reporting of privacy breaches

The Privacy Officer will assess any privacy breaches or complaints.

Where required, we will notify the Office of the Privacy Commissioner and affected individuals in accordance with the Privacy Act 2020.

Updates to this policy

We may update this Privacy Policy from time to time by publishing a revised version on our website.

Contact details

If you would like to access or correct your personal information, or have any privacy concerns, please contact:

Hatton Financial Services

Email: theresa@hattonfinancial.co.nz

Phone: 027 444 4038

Address: Castor Bay, Auckland 0620