

**LONG BRIDGE SECURITIES LIMITED**  
**PRIVACY POLICY**

This document given is the use of any personal information collected by LongBridge during the course of it providing any services to you in accordance with any client agreement that you have entered into with it.

**1. Interpretation:** In this document, the following terms have the meanings given to them below:

- (a) *AML/CFT Act* means the Anti-Money Laundering and Countering Financing of Terrorism Act 2009.
- (b) *Authority* means any government body established under any jurisdiction that, within that jurisdiction, administers any enactment relating to privacy or the holding of information, including in New Zealand the office of Privacy Commissioner governed by the Privacy Act.
- (c) *Client Agreement* means any agreement entered into between you and LongBridge.
- (d) *Client Information* means any information given to LongBridge by you for the purposes of, or ancillary to, any of the Services and includes at least the following:
  - (i) Your full name;
  - (ii) Your date of birth;
  - (iii) Your email address;
  - (iv) Your phone number;
  - (v) Your street and postal address;
  - (vi) Any photographic identification provided by you to LongBridge, including your driver's licence and/or passport;
  - (vii) The bank account from which you may deposit funds into any account operated by LongBridge, and into which LongBridge may deposit from time to time any funds due to you in accordance with the terms of the Client Agreement; and
  - (viii) Any information collected as part of your incidental use of the Services.
- (e) *Cookie* means any alphanumeric identifier which LongBridge transfers to your computer through your web browser when you visit LongBridge's website.
- (f) *Data Storage Policy* means the policy set out in the Schedule.

- (g) *Law* means any common or customary law and any constitution, decree, judgment, legislation, order, ordinance, regulation, statute, treaty or other legislative measure, in each case of any jurisdiction.
- (h) *LongBridge* means Long Bridge Securities Limited, a company duly incorporated under the law of New Zealand and having company number 6551392.
- (i) *Policy* means the privacy policy set out in this document.
- (j) *Portal Account* means the account available for use by you under the Client Agreement.
- (k) *Privacy Act* means the Privacy Act 1993, and from 1 December 2020, the Privacy Act 2020.
- (l) *Services* means any services provided by LongBridge to you under the Client Agreement.

**2. General Intent:** Any Client Information given by you to LongBridge during the course of, or as a consequence of, using the Services or as otherwise requested by us as a precondition to using the Services is governed by this Policy.

**3. Holding of Confidential Information:** Any Client Information will be:

- (a) collected and held both physically and electronically by LongBridge's registered physical address; and
- (b) stored, as far as practicable, in accordance with the Data Storage Policy.

**4. Authorisation:** By entering into the Client Agreement, you agree and authorise the collection, use, disclosure, storage and retention of Client Information by LongBridge in accordance with this Policy.

**5. Collection of Client Information:** When you use the Services, LongBridge will collect information about you, through Cookies, which may be stored by LongBridge and you acknowledge that:

**6. Cookies:** Cookies may be used by LongBridge to:

- (a) Track visitor use of LongBridge's website and to compile statistical reports on that website's activity;
- (b) Compile aggregate information about areas of LongBridge's websites that are visited most frequently;

but will not be used for collecting any information that can or may be used to identify you.

**7. Use of Client Information:** As part of LongBridge providing the Services and providing the Portal Account to you, LongBridge will or may use Client Information for the following purposes:

- (a) As permitted by the Client Agreement;

- (b) In undertaking any of the Services
  - (c) To any third parties for the purposes of obtaining any credit check, or for the purposes of completing any identity verification, including under the AML/CFT Act or any other law.
  - (d) To detect, prevent, protect against fraud and financial crimes;
  - (e) To comply with any Law.
  - (f) For the purposes of communicating with you for the purpose of improving any of the Services;
  - (g) For the purposes of sending any targeted emails or text messages about any content LongBridge believes you may be interested in, or services which are provided by any of our business partners; to the exchange upon which any securities you wish to buy or sell using our services are traded;
  - (h) Any third parties who themselves provide services necessary or desirable for LongBridge to provide the Services to you;
  - (i) Any government authority where required by Law, including any Law relating to taxation in any jurisdiction such as the Foreign Account Tax Compliance Act (United States) and the Income Tax Act 2007;
  - (j) To LongBridge's own professional advisers;
  - (k) To any third-party where that third-party is, in the opinion of LongBridge, acting in good faith, potentially acquiring either all or any part of LongBridge's business, or any shares LongBridge has issued.
- 8. Overseas Entities:** By entering into the Client Agreement, the Client authorises LongBridge to disclose Client Information in accordance with this Policy to third-parties outside the jurisdiction of New Zealand, and in such case:
- (a) You acknowledge that such third parties may not be subject to the same or equivalent Law that applies to Privacy in New Zealand; and
  - (b) LongBridge will nonetheless take reasonable steps to ensure that any Client Information so supplied will not, so far as is practicable, be used by such third-party in any way materially different to how Client Information may be used either by LongBridge itself under this Policy or under New Zealand Law generally.
- 9. Third Party and Unauthorised Use:** Although LongBridge will encourage any person or parties to whom LongBridge has disclosed Client Information in accordance with this Policy to comply with privacy obligations equivalent to those imposed under the Privacy Act and/or this Policy:
- (a) LongBridge cannot and does not guarantee that in all circumstances any such third-party will so comply; and

- (b) LongBridge accepts no liability and is not liable to the Client in any way whatsoever for the use or mis-use of Client Information:
    - (i) By any third-party to whom LongBridge has disclosed Confidential Information in accordance with this Policy;
    - (ii) By any third-party who has illegally accessed or obtained Client Information due to, for example, fraud or hacking
- 10. Retention of Information:** LongBridge will retain any Client Information for:
- (a) So long as the Client Agreement remains in place;
  - (b) For at least seven years after the Client Agreement has been terminated, or such longer time as LongBridge deems necessary or desirable:
    - (i) To fulfil the purposes set out in this Policy;
    - (ii) For the purposes of fraud prevention, safety, and security;
    - (iii) To comply with any Law;
    - (iv) To comply with any guidelines issued by any Authority; or
    - (v) To comply with best industry practice as determined by LongBridge.
- 11. Review of and Access to Client Information:** If at any time you wish to access any Client Information that LongBridge is holding, you may contact LongBridge's privacy officer by email at [Privacy Office contact email], and in such case, LongBridge shall be entitled to charge a reasonable administration fee for making that information available.
- 12. Correction of Client Information:** You may require that LongBridge correct any Client Information that is inaccurate or out of date, but LongBridge will only delete Client Information in accordance with the retention of information rules set out at clause 8 of this Policy.
- 13. Amendment of Policy:** LongBridge may review or review this Policy from time to time, and such reviewed or amended Policy will become effective one calendar month after the date it is published on LongBridge's website at [longbridge.global](https://longbridge.global)

**SCHEDULE  
DATA STORAGE POLICY**

- 1.** Security is LongBridge's top priority. LongBridge and/or its group companies will strive at all times to ensure that Client Information will be protected against unauthorized or accidental access, processing or erasure.
- 2.** LongBridge maintains this commitment to data security by implementing appropriate physical, electronic and managerial measures to safeguard and secure Client Information.
- 3.** The secure area of LongBridge's website supports the use of Secure Socket Layer (SSL) protocol and 128-bit encryption technology - an industry standard for encryption over the Internet to protect data. When you Client Information, it will be automatically converted into codes before being securely dispatched over the Internet.
- 4.** LongBridge's web servers are protected behind "firewalls" and LongBridge's systems are monitored to prevent any unauthorized access. Only your valid User ID and Password, which identify you uniquely, will allow you to log in to LongBridge's secure website(s) and/or LongBridge's applications or apps. This ensures that messages from authorized users only are admitted into LongBridge's secure site(s).