Client Privacy Policy

for Coastal Accounting Limited

Policy owner	Katrina Goldie, Linelle Martinovich
Approver	Board
Review time frame	Every 2 years
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Document history

Version	Date	Amendments
V1	01.12.2020	Approval of initial policy
V2	01.12.2020	Updated to reflect Privacy Act 2020
V3	01.05.2026	Updated for IPP 3A and third-party collection disclosures
V4	21.10.2026	Targeted privacy review and updates

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Purpose

We know that how we collect, use, disclose and protect your information is important to you, and we value your trust. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

The purpose of this Privacy Policy is to explain to our clients and users of our website and other digital platforms how Coastal Accounting Limited manages personal information in accordance with the New Zealand Privacy Act 2020 (the Privacy Act).

Using our digital platforms

When you contact us through our website, social media or another digital platform, we will collect and handle your personal information in accordance with this Privacy Policy. If you prefer not to use a digital platform, you can contact us by telephone on 09 435 3426.

Collection of personal information

Personal Information is defined in the Privacy Act as information about an identifiable individual (a natural person as opposed to a company or other legal entity).

Types of personal information we collect

The types of personal information we collect will vary depending on the nature of your dealings with us. We only collect personal information that is necessary. Where reasonable and practicable, we will collect your personal information directly from you and inform you that we are collecting it.

We mainly collect personal information directly from you, for example:

- In Person
- Over the telephone or during a video call, for example when you contact one of our team;
- Through our website, social media pages or another digital platform;
- When you email or write to us; or
- When you participate in a marketing campaign, competition or promotion (or a similar event) administered by us or our representatives.

If it is not obvious that we are collecting personal information from you, we will do our best to make it clear to you so that you are always aware when information is being collected.

Generally, the types of personal information we collect and hold include your:

- Name
- Date of birth

- Place of birth
- IRD Numbers
- Copies of your ID such as drivers licences, passports for AML Purposes
- Contact details (such as your email address, postal address, phone number)
- Details relating to your use of any product and/or service offered by us
- Details of your enquiry
- Details of any preferences you tell us about (such as subscription preferences)

We may also collect personal information about you from third parties including:

- Inland Revenue;
- ACC;
- Banks and financial institutions;
- Lenders and insurers;
- Previous accountants, bookkeepers or advisers;
- Solicitors and professional advisers;
- Xero, MYOB and other accounting software providers;
- AML/CFT identity verification providers;
- Credit reporting agencies;
- Referral partners and introducers;
- Government agencies and regulators;
- Publicly available registers and internet sources.

The information collected may include:

- Tax and financial information;
- Identity verification information and documents;
- Business ownership and entity information;
- Lending or insurance information;
- Payroll or employment information;
- Contact details; and
- Other information reasonably required to provide accounting, taxation, bookkeeping and advisory services.

We collect this information for purposes including:

- Providing accounting and advisory services;

- Preparing financial statements and tax returns;
- Complying with legal and regulatory obligations including AML/CFT requirements;
- Identity verification;
- Communicating with third parties on your behalf;
- Assessing eligibility for services;
- Debt recovery and credit-related purposes; and
- Administration of our client relationship.

We collect personal information from these parties where authorised by you, where permitted or required by law, or where reasonably necessary to provide services to you.

Information collected from third parties

In some circumstances, we may collect personal information about individuals indirectly through third parties rather than directly from the individual concerned.

This may occur where:

- Information is provided by a spouse, director, shareholder, trustee, employee, guarantor or associated person;
- Information is received through referrals or introductions;
- Information is obtained from lenders, insurers, software providers, professional advisers or government agencies; or
- Information is required for accounting, taxation, advisory, AML/CFT or compliance purposes.

Where IPP 3A applies, we will take reasonable steps to ensure the individual is aware:

- That the information has been collected;
- The purpose for which the information has been collected;
- The intended recipients of the information;
- The name and contact address of Coastal Accounting Limited as the agency collecting and holding the information;
- The particular law authorising or requiring the collection, if applicable; and
- The individual's rights to request access to and correction of the information.

Website information and cookies

When you use our website, limited technical information may be collected automatically, such as your IP address, browser or device type, pages visited and the date and time of your visit. Our website may use cookies and similar technologies to operate correctly and help us understand how it is used. You can manage cookies through your browser settings.

Purpose of collection and use of personal information

Any personal information you provide to us may be used to:

- Check whether you are eligible for the product or services offered by us;
- Facilitate those services;
- Provide information that you request; and / or
- Provide you with further information about our other products and services.
- Comply with legal and regulatory obligations including AML/CFT requirements;
- Undertake identity verification;
- Communicate with regulators, financial institutions, lenders, insurers or professional advisers on your behalf;
- Perform credit-related checks or debt recovery processes where required; and
- Administer and manage our client relationship.

We also have an obligation to maintain personal information to disclose to regulatory and similar bodies - see "Disclosure of your personal information" below. We may disclose personal information to government agencies, regulators and similar bodies where the disclosure is authorised or required by applicable law or otherwise permitted under the Privacy Act 2020.

Storage and protection of your personal information

We may store personal information in paper or electronic form using our business systems and cloud service providers.

We take reasonable steps to protect personal information from loss, misuse, unauthorised access, disclosure, alteration or destruction. These safeguards include appropriate access controls, physical security measures, confidentiality requirements for employees and contractors, and security measures within the systems we use.

We retain personal information only for as long as it is reasonably required for the purposes for which it was collected or to meet our legal and professional obligations. When it is no longer required, it will be securely destroyed or de-identified.

Cloud-based service providers

We use third-party cloud-based service providers to store and process personal information. This information may be stored or processed in New Zealand or overseas.

We take reasonable steps to use reputable providers with appropriate privacy and security safeguards and handle any overseas disclosures in accordance with the Privacy Act 2020.

Timeframes for keeping personal information

We retain personal information for the periods required by applicable legal, regulatory and professional obligations and for legitimate business purposes, including resolving disputes or complaints.

Some accounting and tax records must generally be retained for at least seven years. Where the AML/CFT Act applies, relevant transaction records must generally be retained for at least five years after the transaction, and identity-verification records for at least five years after the relevant business relationship or occasional transaction or activity ends. Longer periods may apply where required by law or a regulator.

We have a records management policy that governs how we manage our information and records to enable us to destroy any information that is outdated, irrelevant or no longer necessary.

If there is a privacy breach

We work hard to keep your personal information safe. If a privacy breach occurs, we will promptly take steps to contain it and assess the risk of harm. If the breach has caused, or is likely to cause, serious harm, we will notify the Office of the Privacy Commissioner and affected individuals as soon as practicable, unless an exception applies. Our response may include:

- Seek to quickly identify and secure the breach to prevent any further breaches and reduce the harm caused;
- Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals;
- Advise and involve the appropriate authorities where criminal activity is suspected;
- Notifying affected individuals where required;
- Providing public notice where direct notification is not reasonably practicable; and
- Notifying the Office of the Privacy Commissioner where required.

Disclosure of your personal information

We may disclose your personal information to others outside Coastal Accounting Limited where:

- It is necessary to enable us to achieve the purpose that we collected the information for;

- We are required or authorised by law or where we have a public duty to do so;
- You have expressly consented to the disclosure or your consent can be reasonably inferred from the circumstances; or
- We are permitted to disclose the information under the Privacy Act 2020.

Parties we may disclose your information to

Your personal information may be used by us for the purpose of providing advice and services to you and may also be used by agencies such as, but not limited to:

- Any out-sourced service provider who assists in the services we are required to carry out such as auditors and external compliance reviewers;
- Government agencies, regulators and other authorities where disclosure is required or permitted by law
- Credit reporting and debt collecting organisations;
- AML/CFT verification providers;
- Software and cloud service providers;
- Banks, lenders and insurers;
- Professional advisers acting on your behalf;
- Referral partners where reasonably necessary to provide services.

We will not disclose your personal information for unrelated purposes unless you have authorised us to do so or the disclosure is otherwise permitted or required by law. We do not sell personal information.

Third party websites

Our website and social media pages may contain links to third-party websites. Those websites have their own privacy practices, and we encourage you to review their privacy policies.

Right to access and correct personal information

You have the right to request access to the personal information we hold about you and to ask us to correct it if you believe it is inaccurate.

To make a request, please contact us at:

2A Grant Street
Te Kamo
Whangārei 0112

Email: office@coastalaccounting.co.nz

We may need to verify your identity before responding to your request. We will respond in accordance with the Privacy Act 2020.

What happens if you do not provide us your information?

If you do not provide information we have requested, you may be unable to obtain or access our services for which the information is required. Please ask us if you are unsure what information is important and how this might affect you.

Changes to this Privacy Policy

We review this Privacy Policy periodically to keep it current and available on our website. If the changes are significant, we may advise you directly. You may also obtain a copy of the latest version by calling us on 09 435 3426.

Privacy Policy queries and concerns

If you are concerned about how your personal information is being handled or if you feel that we have compromised your privacy in some way, please contact us at:

2A Grant Street, Te Kamo Whangarei 0112
office@coastalaccounting.co.nz
09 435 3426

We will acknowledge your complaint within three working days of its receipt. We will let you know if we need any further information from you to investigate your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five working days, but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are not satisfied with our response to a privacy concern, you may complain to the Office of the Privacy Commissioner through privacy.org.nz or by calling 0800 803 909.