

AMLHub privacy policy

INTRODUCTION

Anti-Money Laundering Solutions Limited (**we, us, our**) complies with the Privacy Act 1993 (New Zealand) when dealing with personal information.

Personal information is information about an identifiable individual (a natural person).

This policy does not limit or exclude any of your rights under the Privacy Act 1993 (New Zealand) and all other applicable privacy and data protection laws. For further information on the Privacy Act 1993 (New Zealand), see www.privacy.org.nz.

This policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. We are happy to provide any additional information or explanation needed. Any request for further information should be sent to notify@amlsolutions.co.nz

CHANGES TO THIS POLICY

We may change this policy by uploading a revised policy onto our website. The change will apply from the date that we upload the revised policy.

This policy was last updated on 1st March 2019.

WHEN DOES THIS PRIVACY POLICY APPLY

This privacy policy applies to personal information we collect from visitors to the AMLHub website, AMLHub customers, and other persons with whom we deal directly in relation to AMLHub.

Users of AMLHub may collect personal information from individuals (e.g. their employees and customers) and upload, store or process that information to or in AMLHub (**User Data**).

Our customers determine what and how they collect, use, disclose and transfer User Data. This means that our customers' collection and use of User Data is governed by their privacy policy and practices, not ours.

We only process User Data as authorised by our customers in our AMLHub Terms of Use available at [\[https://amlsolutions.co.nz/wp-content/uploads/2019/02/AMLHub-terms-of-use.pdf\]](https://amlsolutions.co.nz/wp-content/uploads/2019/02/AMLHub-terms-of-use.pdf). Unless required otherwise under applicable law, if we receive any request or enquiry relating to User Data, we will forward this request to our relevant customer.

The remainder of this privacy policy does not apply to User Data.

WHAT PERSONAL INFORMATION DO WE COLLECT

Directly from you

We collect the following information directly from you:

- ▲ when you fill in a contact or enquiry form on the AMLHub website, call us, meet us in person or otherwise contact us relating to AMLHub, your name, email address, phone number and any other information you choose to provide to us
- ▲ when you sign up to our newsletter and other electronic alerts relating to AMLHub, your name, email address and any other information you provide to us when you ask to receive our newsletter or other alerts
- ▲ when you register for, or login to, an account on AMLHub, your name, email address and any other information we require or ask for to set you up with an account or that you submit to us for billing or payment purposes.

Some personal information that we collect directly from you may be mandatory and some may be optional. We will let you know which of these applies at the time we collect the relevant personal information. While you do not have to provide us with some information we may request, this might mean that the AMLHub website or AMLHub may not perform as well as they should, or that we may not be able to provide some parts of the AMLHub website or AMLHub to you. If you require further information about the consequences of not providing us with any information, please contact us at notify@amlsolutions.co.nz

Automatically when you use the AMLHub website or AMLHub

When you access and use the AMLHub website or AMLHub we may automatically collect information about your device and usage of the AMLHub website and AMLHub, including your IP address, operating system, browser type, time spent on certain pages of the website, pages visited and links clicked.

Some of this data is collected through third party tools and/or the use of cookies, web beacons and similar storage technologies. Please refer to our Cookie Policy below for further information, including information on how you can disable these technologies.

HOW WE USE YOUR PERSONAL INFORMATION

We may use your personal information:

- ▲ *to contact you*
- ▲ *to provide the AMLHub website and/or AMLHub to you*

- ▲ *to market our products and services to you, including contacting you electronically (e.g. by text or email for this purpose)*
- ▲ *to improve the AMLHub website and AMLHub*
- ▲ *to bill you and to collect money that you owe us, including authorising and processing credit card transactions*
- ▲ *to respond to communications from you, including enquiries and complaints*
- ▲ *to conduct research and statistical analysis (on an anonymised basis)*
- ▲ to protect and/or enforce our legal rights and interests, including defending any claim
- ▲ to respond to lawful requests by public authorities, including to comply with law enforcement requirements, or
- ▲ for any other purpose authorised by you or applicable law.

You can stop receiving our marketing emails by [*following the unsubscribe instructions included in those emails or*] contacting us directly.

DISCLOSING YOUR PERSONAL INFORMATION

We may disclose your personal information to:

- ▲ *another company within our group*
- ▲ *any business that supports the AMLHub website or AMLHub, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the AMLHub website or AMLHub [or that we use to process payments]*
- ▲ *third parties (for anonymised statistical information)*
- ▲ a person who can require us to supply your personal information (e.g. a law enforcement agency or regulatory authority)
- ▲ any other person authorised by applicable law
- ▲ any other person with your consent

We may share information about your use of the AMLHub website with our trusted [analytics and advertising] partners through the use of cookies, web beacons, and similar storage technologies. Please refer to our Cookie Policy below for further information.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

A business that supports the AMLHub website or AMLHub may be located outside of New Zealand. This means that the personal information we collect may be transferred, and stored, outside of New Zealand.

PROTECTING YOUR PERSONAL INFORMATION

We will take steps as required by applicable laws to keep your personal information safe from loss, unauthorised activity, or other misuse. We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks inherent in processing personal information.

You play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used in relation to our products and services. You should not disclose your password to third parties. Please notify us immediately if there is any unauthorised use of your account or any other breach of security.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

Subject to certain grounds for refusal under applicable law, you have the right to access your personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

Where you request correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. In all other cases, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email us at notify@amlsolutions.co.nz. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information or the correction that you are requesting).

Subject to applicable law, we may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

INTERNET USE

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information to that owner or site.

DATA RETENTION POLICY

The personal information that we collect and use will not be kept longer than necessary for the purposes for which it is collected, or for the duration required for compliance with applicable law, whichever is longer.

CONTACTING US

If you have any question about this privacy policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us at notify@amlsolutions.co.nz

Cookie policy

INTRODUCTION

We use cookies on the AMLHub website and as part of AMLHub, and receive information collected through cookies. This cookie policy explains how we use cookies and how you can opt out of cookies.

By continuing to use the AMLHub website and/or AMLHub, you indicate your agreement for us to use the cookies described below.

We use the term *cookies* in this cookie policy to mean cookies or similar technologies such as web beacons, clear GIFs, and pixel tags.

WHAT ARE COOKIES

Cookies are text files containing small amounts of information which are downloaded to your browsing device, e.g. a computer or smartphone, when you visit a website. Cookies can be recognised by the website that downloaded them, or by other websites that use the same cookies. This helps a website know if the browsing device has visited that or other websites before.

Cookies can be used to collect information relating to your use of a website or your device, let you navigate between pages effectively, remember your preferences, and generally improve your browsing experience.

Cookies can be *session* or *persistent* cookies. Session cookies are temporary and only stay on your browser until you stop browsing. Persistent cookies stay on your device until they expire or are deleted.

The cookies used on the AMLHub website and AMLHub may be first party cookies (i.e. set by us) or third party cookies (i.e. set on our website by a person other than us). The third party companies that place cookies on our website will have their own privacy policies.

WHAT TYPES OF COOKIES DO WE USE

The types of cookies used by us, and most websites, can generally be categorised as follows. **Strictly necessary cookies**

These cookies are essential for the full functionality of our website and related services. They enable you to navigate around our website and services, and use their features e.g. accessing secure areas and enabling services that you have specifically asked to receive. If you opt out of these cookies, you may not be able to access all the functions of our website and some services that you have asked for.

These cookies do not track where else you have been on the internet and do not remember your preferences beyond your current visit. These cookies are generally first party session cookies which will expire when you close your browsing session. These cookies do not collect information that could be used for marketing purposes.

Functionality cookies

These cookies allow a website to remember choices you make and provide enhanced, more personal features. E.g. these cookies allow us to remember the settings you have applied to the website (such as. font size, preferences or colours), identify whether you are a returning website visitor and present you with a personalised version of the website, or eliminate the need for you to re-enter your login details. The information these cookies collect is generally anonymous and they do not track your browsing activity on other websites. These cookies may be first or third party, session or persistent cookies.

Performance cookies

These cookies collect information about how you use a website, e.g. which pages are the most visited and if you receive any error message from any page. This information helps us improve the way the website and services work and helps us manage the performance and design of the website. These cookies do not gather information that identifies you. All information these cookies collect is aggregated and anonymous. These cookies may be first or third party, session or persistent cookies.]

THIRD PARTY COOKIES

We may use Google Analytics to collect information about visitors to the AMLHub website and users of AMLHub. Google Analytics collects information related to your device, browser, IP address, network location, and website activities to measure and report statistics about your interactions on the AMLHub website and AMLHub. We use this information to help us manage the performance and design of the AMLHub website and AMLHub and to improve the AMLHub website and AMLHub.

For further information on how Google uses your personal information when you use the AMLHub website or AMLHub and how to opt out of Google's use of cookies, see [here](#). In addition to this link, you can opt out as described in the "How to control or opt out of cookies" section below

HOW TO CONTROL OR OPT OUT OF COOKIES

You can control and/or delete cookies as you wish. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. However, if you do this, you may have to manually adjust some preferences every time you visit our website and attempt use our services, you may not be able to access certain parts of the AMLHub website or AMLHub, and some functionalities may not work.

You can find out more information about how to change your browser cookie settings at <http://www.aboutcookies.org.uk>.

To learn more about how to control cookie settings through your browser:

- ▲ click [here](#) to learn more about the *Private Browsing* setting and managing cookie settings in Firefox
- ▲ click [here](#) to learn more about *Incognito* and managing cookie settings in Chrome
- ▲ click [here](#) to learn more about *InPrivate* and managing cookie settings in Internet Explorer
- ▲ click [here](#) to learn more about *Private Browsing* and managing cookie settings in Safari.

THIRD PARTY WEBSITE COOKIES

If you follow a link on the AMLHub website or AMLHub to another site, the owner of that site will have its own cookies. We suggest you review that website's cookie policy before you visit that website.