



PRIVACY STATEMENT

This Privacy Statement explains how the Nominated Member Funeral Home or related services provider selected by you or your authorised representative, the company administering the Now For Them Plan (The Funeral Trust Services Limited – “the Company”) and the Funeral Directors Association of New Zealand Inc (“the Association”) may collect, use, hold and disclose your Personal Information to establish, administer and give effect to your account in the Now For Them plan (“Plan”).

Personal Information is information about an identifiable individual person. For the purposes of the Privacy Act 2020, the Company provides the Now For Them Plan. The Member Funeral Homes, the Company and the Association each act as separate “agencies” in respect of the Personal Information they collect and use for their own purposes. Where the Association and the Nominated Member Funeral Home collect Personal Information on behalf of the Company, they act as its agents.

The Privacy Officer for the Company and the Association can be contacted as below:

Privacy Officer for The Company: *Now For Them*
Team Leader

Privacy Officer for the Association: Chief Executive,
Funeral Directors Association of New Zealand

info@nowforthem.co.nz.

PO Box 25148
Featherston Street
Wellington 6146

Personal Information is gathered directly from and about the:

- Plan Account Holder (being the person for whom the funeral prepayment is arranged)
- Authorised Signatory (any attorney under a power of attorney, court order or other legal authority type)
- Any nominated contact person of the Account Holder.

We will usually collect personal information directly from you. We may collect personal information about you from another source where this is permitted by Information Privacy Principle 2 of the Privacy Act 2020 and the information is necessary for one or more of the purposes described in this privacy statement. Where we collect personal information about you from another source, we will take reasonable steps to notify you of the matters required by Information Privacy Principle 3A (“IPP3A”), unless an exception applies. These third parties may include but are not limited to:

- Authorised representatives; Beneficiaries; Selected service providers; Payment providers; Identity verification providers; Public registers; and
- Government agencies.

If personal information is gathered indirectly, the agency that collects the Personal Information must as soon as is reasonably practicable after the information has been collected (unless those steps were taken sooner), take reasonable steps to inform you, your Authorised Signatory or your nominated Primary Contact person:

- That your personal information has been collected;
- The purpose of the collection;
- Who is intended to receive this information;
- The name and address of the agency that collected this information;
- The name and address of the agency that is holding this information;
- If the collection is authorised or required by or under the law and which particular law the collection was authorised or required under; and
- Of your rights to access and correct the

information collected.

We are not required to take those notification steps if we believe on reasonable grounds that an exception in IPP3A applies, including where you have already been made aware of all required matters, notification would not prejudice your interests, the information is publicly available, notification would prejudice the purpose of collection, notification is not reasonably practicable, or another statutory exception applies. Exceptions include:

- You have already been made aware of the collection; or
- That non-compliance would not prejudice your interests; or
- That the information is publicly available; or
- That non-compliance is necessary
 - to avoid prejudice to the maintenance of the law by any public sector agency, including prejudice to the prevention, detection, investigation, prosecution, and punishment of offences; or
 - for the enforcement of a law that imposes a pecuniary penalty; or
 - for the protection of public revenue; or
 - for the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation); or
- That compliance would prejudice the purposes of the collection; or
- That compliance is not reasonably practicable in the circumstances of the particular case; or
- That compliance would cause a serious threat to public health or safety or the health and safety of another individual; or
- That the information will not be used in a form in which you can be identified; or
- That compliance would prejudice the security or defence of New Zealand (or the Cook Islands, Niue, Tokelau, or Ross Dependency), or the international relations of the Government of New Zealand; or
- That compliance would reveal a trade secret.

By applying for, joining, using, or administering

the Plan, you authorise the Company, the Association and the Member Funeral Home to collect personal information about you from the sources described above where that information is necessary to provide *Now For Them*. This authorisation does not limit our obligation to have a lawful purpose for collection, to collect only information necessary for that purpose, and to comply with our notification obligations under IPP3A.

Personal Information is collected in accordance with the Privacy Act 2020 and other applicable privacy law to:

- Process and assess applications for the Plan;
- Administer and manage the Plan;
- Verify your identity and maintain accurate Plan records;
- Communicate with Account Holders, together with their attorneys under a power of attorney, nominated contacts, and estate representatives together with their respective legal representatives;
- Make payments from the Plan to meet account obligations;
- To provide the Account Holder's funeral including arranging, administering, or paying for funeral-related goods and services in accordance with the Plan;
- Meet legal, regulatory, and financial reporting obligations; and
- Fulfil contractual and legal obligations.

These are collectively "the *Now For Them* Services".

Personal Information may be disclosed to:

- The Account Holder, Authorised Signatory, Primary Contact and estate representatives;
- The Nominated Funeral Director Member Funeral Home;
- Executors, administrators, beneficiaries, next of kin, payees and their legal representatives where relevant;

- Other Member Funeral Homes where you decide to change your Nominated Funeral Home or your estate decides to use another Member Funeral home on your death;
- Non-Member Funeral Homes where necessary to arrange payment to an estate;
- The agencies involved in provided or administering the Plan;
- Service providers assisting the Company in administering the Plan (including, without limitation IT, storage, identity verification, professional advisory and payment providers); and
- Government, regulatory judicial or law enforcement agencies where disclosure is required or permitted by law.

Providing personal information is generally voluntary, but if you do not provide information requested for opening a *Now For Them* account, that account will not be able to be opened and/or we may be unable to process an application, administer the Plan, verify identity, make payments, communicate with authorised representatives, or comply with legal obligations. Where information is required by law, we will identify the particular law where practicable.

The Member Funeral Home will also use the Personal Information collected to provide their services including to pre-arrange and provide the funeral and to provide information related to your account, for example balances. The Member Funeral Home has his or her own obligations under the Privacy Act 2020 in connection with Personal Information they collect and use for their own purposes separate from *Now For Them* services.

Some of the agencies' IT or storage providers may be located outside New Zealand. Where

Personal Information is sent overseas, the relevant agency will only do so where on reasonable grounds it believes that an Information Privacy Principle 12 ("IPP12") basis applies, such as comparable lifeguards, contractual protections, the recipient being subject to the Privacy Act, or your informed authorisation.

Personal Information will be stored securely by reasonable safeguards and retained only for as long as required to provide the *Now For Them* services, manage related matters, and comply with legal requirements or as otherwise permitted by law. Unless otherwise required by law after your Personal Information is no longer required to be stored it will be destroyed and/or deleted in electronic and physical form using secure document destruction services if necessary.

You may request access to, or correction of, your readily retrievable Personal Information by contacting

info@nowforthem.co.nz.

We may send you service, account, payment, legal, and transaction-related messages about your *Now For Them* plan. We will only send you commercial electronic messages where we have consent or another lawful basis to do so, and those messages will identify the sender and include an unsubscribe facility.

Privacy concerns or complaints

If you have concerns about how your information has been handled, you may contact info@nowforthem.co.nz or the **Office of the Privacy Commissioner** at www.privacy.org.nz