

# Privacy Policy

**Properli**

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**This document sets out our  
privacy commitment in respect  
of personal information we hold  
about you and what we do with  
that information.**

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## 1. Our Commitment to Protect your Privacy

At Properli, we value your privacy and are committed to protecting your personal information. This Privacy Policy explains how we collect, use, store and disclose your data in accordance with the **Privacy Act 2020** (or any successor legislation) and all other applicable New Zealand laws.

## 2. Who We Are

Properli is a trading name used by the following New Zealand entities:

- TRIPLE M GROUP LIMITED (NZBN: 9429041825877)
- PROPER REALTY LIMITED (NZBN: 9429052769184)
- PROPER DEV CONSULTING LIMITED (NZBN: 9429052827907)

Collectively referred to as "Properli", "we", "our", or "us".

TRIPLE M GROUP LIMITED is also a licensed Financial Advice provider under New Zealand law and the Financial Markets Authority.

## 3. Scope of This Policy

This Privacy Policy applies to personal information collected when you:

- Engage with our **licensed real estate agents** to purchase or sell residential property
- Use our **development advisory** or project consulting services
- Receive **mortgage and insurance advice** through one of our advisers
- Receive personalised **investment advice**, including property investment services.

It also applies to visitors to our website and recipients of our communications or marketing materials.

## 4. What Information We Collect

The personal information we collect depends on your engagement with us and may include:

- Full name, contact details, date of birth
- Proof of identity (passport, driver's licence)
- Income, employment and banking information
- Investment or insurance history
- Health information (where required for insurance purposes)
- Tax residency, IRD number, and AML/CFT documentation
- Communications, preferences and feedback
- Website usage information (via cookies and analytics tools)

We may also collect additional information relevant to the services you require.

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## 5. How We Collect Your information

We collect your information through:

- Direct interactions with you (in person, via forms, calls or emails)
- Through authorised third parties (insurers, lenders, credit agencies)
- Our website and digital platforms including social media
- Cookies, IP tracking and online analytics tools.
- From publicly available sources and government records
- Via digital tools, portals, or our digital forms (fact finds, risk profiling tools)
- Tools used by our Virtual Assistant in the mortgage divisions (see section 7)

## 6. Why We Collect Your Information

We only collect and use your personal information necessary to deliver our services and meet legal obligations. This includes to:

- Provide financial, real estate and development advice and related services
- Recommend suitable providers
- Manage relationships with clients
- Fulfil legal obligations (AML/CFT, REA, IRD & FMA compliance)
- Process applications with third-party providers
- Maintain accurate records
- Communicate with you, including sending marketing material
- Conduct internal reviews, auditing and regulatory reporting
- Improve our website and service delivery
- Support development and real estate advisory work

## Marketing Communications

We may use your contact details to send you updates, offers, newsletters and other promotional content about products or services we believe may be of interest to you. These communications may be sent via email, SMS or phone.

You can opt out of receiving marketing messages at any time by contacting us or using the unsubscribe link in our emails.

## 7. Use of Virtual Assistant Technology

We may use a Virtual Assistant within our mortgage division to help manage client interactions, gather information, and assist in processing applications. Any data shared with or collected by our Virtual Assistants is handled securely and in accordance with this Privacy Policy.

## 8. Who We Share Your Information With

We may disclose your personal information to:

- Product providers (lenders, insurers, investment platforms)
- Third parties involved in your applications or referrals
- AML/CFT and identity verification providers

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- CRM and analytics tool providers
  - Professional advisers, auditors and compliance consultants
  - Our referral partners and intercompanies offering related services
  - Government bodies or regulators (FMA, REA, IRD)
  - Any other parties authorised by you or required by law

We never sell or trade your personal information. We take reasonable steps to ensure any third parties we share data with meet privacy standards at least equal to our own.

## 9. Overseas Disclosure

Some personal information may be stored or processed by cloud-based platforms or third-party providers located outside New Zealand. These providers are subject to strict contractual obligations and privacy safeguards.

## 10. Our Website

### Cookies & IP Tracking

When you visit our website, we may collect information such as:

- IP address, device type, browser version
- Pages visited, time spent, click activity
- Search terms and referring websites

We use cookies and analytics tools to improve site performance and personalise your experience. Cookies may be linked to personally identifiable data if you submit information on our site (newsletter sign up). You can manage cookie settings through your browser.

### Third-Party Links & Advertising

Our website may contain links to third-party websites or advertisements. We are not responsible for their content or privacy practices. You should review their policies independently. Our online advertising partners may use cookies or web tracking to deliver interest-based ads.

## 11. Do You Have to Provide Personal Information?

Providing your personal information is generally voluntary. However, if you choose not to share required information, we may be unable to:

- Provide certain services
- Submit applications to insurers or lenders
- Comply with legal obligations

You may use our website anonymously, but we won't be able to contact or assist you unless personal information is provided.

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## 12. How We Store and Protect Your Information

Your data is securely stored in encrypted, cloud-based systems with:

- Password-protected access and role-based permissions
- Internal privacy and cybersecurity protocols
- Regular data reviews and staff training

We retain financial advice records for at least seven years after the service ends, as required by law. After this period, your data is securely deleted or anonymised.

## 13. Your Rights

Under the Privacy Act 2020, you have the right to:

- Access personal information we hold about you
- Request corrections to inaccurate or outdated information
- Withdraw your consent to marketing communications
- Request deletion of your data (subject to legal retention obligations)
- Lodge a complaint if you believe your privacy has been breached

To exercise this right, please contact:

**Jess Wahlstrom - Privacy Officer**

[privacy@properli.co.nz](mailto:privacy@properli.co.nz)

## 14. Changes to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website, with an updated "Last Updated" date at the top.

## 15. Contact Us

If you have any questions about this Privacy Policy or wish to make a request, please contact:

### Privacy Officer

Email: [privacy@properli.co.nz](mailto:privacy@properli.co.nz)

Phone: 09 361 0050

Address: 2 Princes Street, Auckland CBD, 1010

Website: [www.properli.co.nz](http://www.properli.co.nz)