

Purpose

Wayne Bishop Gorup Finance Limited trading as Enable Finance Group is a small financial advisory and finance business offering both mortgage advice services and lending to approved applicants. 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 inform our clients and any users of our digital platforms (i.e. our website, social media pages) about how we comply with the requirements of the New Zealand Privacy Act 2020 ("the Privacy Act") when dealing with personal information. Personal information is information about an identifiable individual (a natural person). This policy sets out how we will collect, use, disclose, and protect your personal information.

This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, you can contact our Privacy Officer by email at lili.r@efgroup.co.nz Or visit www.privacy.org.nz for further information.

Consent to Privacy Policy

Please note that when you contact us through our website, social media pages, you are agreeing to this Privacy Policy. If you do not agree with this Privacy Policy, please do not contact us through any of our digital platforms but email our Privacy Officer at lili.r@efgroup.co.nz

Changes to this policy

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

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.

For example:

- Over the telephone or a video call (such as over Microsoft Teams, Zoom or Skype) e.g. when you contact our staff;
- Through one of our digital platforms like our website, social media pages (including through any online chat, virtual assistant or bots)
- 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.

Personal information is information about an identifiable individual. It includes (but is not limited to) name, address, contact details, date of birth, occupations, payment details, employment history and/or details, education and qualifications, financial information, testimonials and feedback, evidence of source of funds or source of wealth (in some cases) and other information.

Personal information also covers information related to an individual's credit. Credit-related personal information includes:

Credit information – this is personal information or an opinion about an individual that relates to credit they have received or sought. It may include details such as identity information; the nature, terms, and credit limit of credit provided for personal, domestic, or household purposes (including where the individual acts as a loan guarantor); the date credit was granted and repaid; repayment behaviour; defaults or overdue amounts; payment details; financial hardship or other alternative payment arrangements; serious credit breaches; information about legal proceedings; insolvency records; and other lawfully available public information.

Credit eligibility information – this refers to credit reporting information obtained from a credit reporting body, as well as any information derived or assessed from that reporting data.

We may also collect personal information about you from:

- Publicly available sources e.g. via the internet;
- Your professional advisers e.g. accountant, lawyer;

Third party collection of information

Where we collect your personal information from someone other than you, we will take reasonable steps to notify you that we have collected your personal information, the purpose of the collection, the intended recipients of the information, the name and address of the agency collecting and holding the information, whether the collection is authorised or required by law and, if so, the law that authorises or requires the collection, and your right to access and request correction of that information, unless an exception applies under the Privacy Act 2020.

Online device information and cookies

If you are visiting us through our website or social media pages, then we collect information about your use and experience on these by using cookies. Cookies are small pieces of information stored on your hard drive or on your mobile browser. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience. The cookies we send to your computer, mobile phone or other device cannot read your hard drive, obtain any information from your browser or command your device to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non-Enable Finance Group website or application. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of the website.

When you interact with us through our website or social media pages, the information collected through the cookies may include:

- The date and time of visits;
- Website page (or pages) viewed;
- The website from which you accessed the internet and our website or other digital platform;

- How you navigate through the website and interact with pages (including any fields completed in forms and applications completed (where applicable));
- Information about your location;
- Information about the device used to visit our digital platform; and
- IP address (or addresses), and the type of web browser used.

We may use information about your use of our websites and other IT systems to prevent unauthorised access or attacks on our software. We may utilise services from one or more third-party suppliers to monitor the use of our systems. These third-party suppliers will have access to monitoring and logging information as well as information processed on our websites and other IT systems.

We will not ask you to supply personal information publicly e.g. Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us through a private message, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions, but we would require your express consent prior to us including you in such activities. 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.

Bots

A bot is a piece of software that is programmed to do certain tasks, such as responding to certain phrases with programmed responses. A bot acts in accordance with its instructions, imitating a human user's behaviours, but without a human behind it. When you talk to a bot from a third-party platform such as Facebook Messenger, our third party service provider will temporarily store and analyse your conversation so that the bot can talk back to you. You can read Google's privacy policy [here](#).

The third-party platform provider (i.e. Google may also store your bot conversation. We recommend that you do not share sensitive personal information, such as bank account details, with a bot.

Purpose of collection and use of personal information

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

- to verify your identity
- to provide services and products to you
- to market our services and products to you, including contacting you electronically (e.g. by call, text, or email for this purpose)
- to improve the services and products that we provide to you
- to respond to communications from you, including a complaint
- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorised by you or the Act.

We also have an obligation to maintain personal information to disclose to regulatory and similar bodies - see [“Disclosure of your personal information”](#) below. These bodies have a legal right to such information.

Storage and protection of your personal information

We may electronically record and store personal information which we collect from you. When we do so, we will take all reasonable steps to keep it secure and prevent unauthorised disclosure, safe from loss, unauthorised activity, or other misuse. Our software is subject to audits to ensure it is continuing to meet security requirements. All data handled in our software is encrypted in transit and during storage and can only be accessed over secure network connections. Data will sometimes be held on-premise at 160 Oxford Street in Levin if it is provided to us outside of our software and is always kept secure.

However, we cannot promise that your personal information will not be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur. If we provide you with any passwords or other security devices, it is important that you keep these confidential and do not allow them to be used by any other person. You should notify us immediately if the security of your password or security device is breached, this will help prevent the unauthorised disclosure of your personal information.

Some information we hold about you will be stored in paper files, but most of your information will be stored electronically in the cloud, by cloud service providers – see “[Cloud-based service providers](#)” below.

We use a range of physical and electronic security measures to protect the security of the personal information we hold, including:

- Access to information systems is controlled through identity and access management;
- Our buildings are secured with a combination of locks, monitored alarms and cameras to prevent unauthorised access;
- Employees are bound by internal information security policies and are required to keep information secure;
- Employees are required to complete training about information security and privacy;
- When we send information overseas or use service providers to process or store information, we put arrangements in place to protect your information;
- We regularly monitor and review our compliance (and our service providers’ compliance) with internal policies and industry best practice.
- We only keep information for as long as we need it, or as long as the law requires us to. We have a records management policy that governs how we manage our information and records to make sure we destroy any information that is outdated, irrelevant or unnecessary.

Cloud-based service providers

We use third party service providers to store and process most of the information we collect. All data stored online is backed up and can be retrieved in the event of data loss or corruption. We use Microsoft Azure cloud servers located in New Zealand and Australia. We ensure that our cloud-based service providers are subject to appropriate security and information handling arrangements and that the information stored or processed by them remains subject to confidentiality obligations.

Timeframes for keeping personal information

We take reasonable steps to destroy or permanently de-identify any personal information as soon as practicable after the date of which it has no legal or regulatory purpose, or we have no legitimate business purpose with it.

In the case of information that relates to our advice services or products or services we have provided, we are required by law to hold this information for seven years. After this time, provided that the personal information is no longer relevant to any service we are providing you, we will take reasonable steps to safely destroy or de-identify any personal information.

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. However, despite applying strict security measures and following industry standards to protect your personal information, there is still a possibility that our security could be breached. If we experience a privacy breach, where there is a loss or unauthorised access or disclosure of your personal information that is likely to cause you serious harm, we will, as soon as we become aware of the breach:

- 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;
- Where appropriate, notify any individuals who are affected by the breach (where possible, directly);
- Where appropriate, put a notice on our website advising our clients of the breach; and
- Notify the Privacy Commissioner.

Disclosure of your personal information

We may disclose your personal information to others outside Enable Finance Group where:

- Other companies or individuals who assist us in providing services or who perform functions on our behalf (such as mailing houses, hosting and data storage providers, specialist consultants, and legal advisers);
- Product providers (such as but not limited to lenders and insurance companies);
- Financial advisers and financial advice providers who may use our services;
- Other companies or individuals who perform checks (such as but not limited to compliance reviews and audits) that are necessary or desirable under the law on our behalf;
- Other companies, agencies, or individuals that maintain databases against which your identity may be verified, which may include (but are not limited to) the New Zealand Department of Internal Affairs, and New Zealand Transport Agency;
- Social media sites on which we may have a presence;
- Courts, tribunals, and regulatory authorities (such as the Financial Markets Authority, and the Ministry of Justice in New Zealand);
- Office of the Ombudsman, where a complaint relates to official information;
- Any person or agency we believe could assist in responding to a serious privacy breach.
- Office of the New Zealand Privacy Commissioner, where a complaint relates to breach of the Privacy Act 2020;
- Human Rights Commission, where a complaint relates to discrimination;
- CERT NZ, where appropriate to assist with the management of a voluntarily notified privacy breach
- Overseas privacy regulator, where a complaint relates to the actions of an overseas agency; and
- Anyone else to whom you authorise us to disclose it.

Except as described above, we will not disclose your personal information without your written or oral consent, unless we are required to do so by applicable law.

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;
- Our external dispute resolution service;
- The Regulator;
- Credit reporting and debt collecting organisations.

If we don't need to share your information with a third party in order to provide advice and services to you, we will not pass on your information to them without your consent. Under no circumstances will we sell or receive payment for disclosing your personal information.

Sending your information overseas

We may send your personal information outside New Zealand, including to overseas members of Enable Finance Group's related companies and overseas service providers or other third parties who process or store our information, or provide certain services to us.

Where we do this, it does not change any of our commitments to you to safeguard your privacy. We make sure that appropriate security and information handling arrangements are in place and the information remains subject to confidentiality obligations.

All countries have different privacy laws and information protection standards. If we need to send your personal information to a country that has lower standards of information protection than in New Zealand, we will take appropriate measures to protect your personal information. Where it is not possible to ensure that appropriate security and information handling arrangements are in place, we will let you know and gain your consent prior to sending your personal information overseas.

Third party websites

Through our website or our other social media pages, you may be able to link to other websites which are not under our control. We are not responsible for the privacy or security practices of those third-party websites and the sites are not covered by this Privacy Policy. Third party websites should have their own privacy and security policies, and we encourage you to read them.

In addition, we have no knowledge of (or control over) the nature, content, and availability of those websites. We do not sponsor, recommend, or endorse anything contained on these linked websites. We do not accept any liability of any description for any loss suffered by you by relying on anything contained or not contained on these linked websites.

Right to access, correct and delete personal information

You have the right to request access to, correct and, in some circumstances, delete your personal information. You can do so by contacting us at:

- 160 Oxford Street, Levin 5510
- Or via email at lili.r@efgroup.co.nz

When you contact us with such a request, we will take steps to update or delete your personal information, provide you with access to your personal information and/or otherwise address your query within a reasonable period after we receive your request. To protect the security of your personal information, you may be required to provide identification before we update or provide you with access to your personal information.

We are only able to delete your personal information to the extent that it is not required to be held by us to satisfy any legal, regulatory, or similar requirements.

There is no fee for requesting that your personal information is corrected or deleted or for us to make corrections or deletions. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access or to correct or delete your personal information, we will let you know our reasons, except if the law prevents us from doing so.

If we refuse your request to correct or delete your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access, correct or delete your personal information, we will also provide you with information on how you can complain about the refusal.

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 emailing us at lili.r@efgroup.co.nz

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:

- 160 Oxford Street, Levin 5510
- Email at lili.r@efgroup.co.nz
- Phone 022 652 2442

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 any privacy related concern, you may lodge a complaint on the Privacy Office website (www.privacy.org.nz) or send a complaint form to the Privacy Commissioner at:

Office of the Privacy Commissioner
P O Box 10-094
Wellington 6143, New Zealand
Fax: 04- 474 7595



Email: enquiries@privacy.org.nz

Telephone: 0800 803 909

Website: www.privacy.org.nz

Agent and Third Party Schedule

Wayne Bishop Group Finance Limited T/A Enable Finance Group (EFG) shares personal information with the agents and third parties listed below in order to provide financial advice services, meet legal and regulatory obligations, and operate our business. In each case, only the personal information necessary for the relevant purpose is shared. All third parties are subject to due diligence review and are required to handle personal information in accordance with the New Zealand Privacy Act 2020.

Complete Schedule last updated April 2026

Lead Aggregator (Advisory)

KAN (Kiwi Adviser Network)

Purpose: KAN provides aggregation, compliance support, and lender panel access to EFG. Personal information (including client identity, financial position, and loan details) is shared with KAN to facilitate the arrangement of financial advice, lender submissions, and ongoing compliance with FAP licence obligations. KAN also holds the lender panel schedule on behalf of EFG.

Privacy Officer contact: compliance@kiwiadvisernetwork.co.nz

Address: 4/23 Aviemore Drive, Highland Park, Auckland 2010, New Zealand

Email: admin@kiwiadvisernetwork.co.nz

Website: kiwiadvisernetwork.co.nz

Authorised Body / Auditor

Strategi

Purpose: Strategi provides compliance auditing and monitoring services to EFG. Personal information (including client files, advice records, and adviser activity) may be accessed by Strategi for the purpose of conducting audits, compliance reviews, and assessing EFG's adherence to its FAP licence obligations and the Financial Markets Conduct Act 2013.

Privacy Officer contact: info@strategi.co.nz

Address: Unit 4, Building E 17 Corinthian Drive, Albany Auckland 0632, New Zealand

Website: <https://strategigroup.co.nz>

Staff / Contractors of the wider Organisation

WBG (Wayne Bishop Group)

Purpose: WBG provides shared services to EFG, including HR, payroll, and operational support. Personal information relating to EFG staff and contractors (including employment details, remuneration, and contact information) is shared with WBG for the purpose of managing employment relationships, payroll processing, and workforce administration. Personal information relating to EFG construction and in-house Solicitor for sale co-ordination may also take place where relevant.

Address: Unit 1D, 5 Bush Street, Levin

Email: Shaun.t@wbg.co.nz

Website <https://www.wbg.co.nz>

Technology Providers

Trail

Purpose: Trail is EFG's primary CRM and client management platform. Personal information (including client identity, contact details, financial information, advice records, and loan data) is held and processed within Trail for the purpose of delivering and managing financial advice, generating client-facing documents and maintaining advice records in accordance with regulatory retention requirements.

Privacy Officer: Support@gettrail.com

Address: 4/23 Aviemore Drive, Highland Park, Auckland, 2010

Website: <https://gettrail.com>

Illion

Purpose: Illion provides credit reporting and data services for bank transactions. Personal information (including identity details and financial history) is shared with Illion for the purpose of the lending process.

Privacy Officer contact: creditreport@au.experian.com

Address: level 33/23/29 Albert Street, Auckland CBD, Auckland 1010

Website: <https://illion.co.nz/>

FinPower & Intersoft

Purpose: FinPower (developed by Intersoft) is a loan management and financial planning software platform used by EFG. Personal information is processed within this system for the purpose of preparing credit contracts, loan structures, and managing direct lending through EFG.

Privacy Officer Contact: enquiry@intersoft.co.nz

Address: 19 Marine Parade, Bluff Hill, Napier 4110

Website: <https://www.intersoft.co.nz>

Yorb

Purpose: Yorb provides IT support and managed services to EFG including IT security. Yorb may access personal information held on EFG's systems in the course of providing technical support, system maintenance, and cybersecurity services. Access is limited to what is necessary to perform these functions.

Privacy Officer contact: support@yorb.tech

Address: 40 King St, Palmerston North

Website: <https://www.yorb.tech>

Microsoft Azure – cloud based storage

Purpose: Microsoft Azure provides cloud-based storage and infrastructure for EFG's data, including client and Staff personal information and records. Information is stored on servers located in New Zealand and Australia. Microsoft Azure is used to ensure secure, encrypted storage of personal information in compliance with EFG's data retention obligations (seven-year minimum for advice records).

Privacy Officer Contact: info@datacenters.com

Address: Microsoft Azure, Rotu Drive, Westgate 0814, Auckland New Zealand

<https://www.datacenters.com/microsoft-azure-new-zealand-north>

Ask Marloo

Purpose: Marloo is an AI-assisted meeting and adviser productivity tool used by EFG. It may process personal information (including meeting transcripts, client notes, and advice-related data) for the purpose of generating meeting summaries, action items, and supporting advisers in their work flow. Marloo has been formally approved by EFG as a compliant AI tool meeting EFG's AI governance, privacy, and security requirements.

Privacy Officer contact: compliance@gomarloo.com

Address: Marloo, Lot 3, 130 Ponsonby Road, Grey Lynn, Auckland 1011

Website: <https://www.marloo.com/nz>

AML/CFT Provider

Cloudcheck

Purpose: Cloudcheck (operated by GBG) provides identity verification and AML/CFT (Anti-Money Laundering and Countering Financing of Terrorism) screening services. Personal information (including name, date of birth, address, and identity document details) is shared with Cloudcheck for the purpose of verifying client identity and meeting EFG's obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 when assessing / processing lending directly through EFG.

Privacy Officer Contact: +61 (0) 3 8595 1500

Address: Head of Privacy, APAC, GBG Level 4 / 360 Collins St, Melbourne, Victoria 3000, Australia

Website: <https://www.gbg.com/nz/>

Credit bureaus

Centrix

Purpose: Centrix is a New Zealand credit bureau. Personal information (including identity details and financial history) is shared with Centrix for the purpose of obtaining credit reports to assess a client's creditworthiness and financial position as part of the assessing and processing of lending directly through EFG. Centrix may also report updated credit information on behalf of lenders as required.

Privacy Officer contact: helpdesk@centrix.co.nz

Address: Centrix Group Ltd, P.O Box 62512, Greenlane, Auckland 1546 Attn: Consumer Services

Website: <https://www.centrix.co.nz/>

Lender Panel (Provided by KAN)

Purpose: EFG submits client applications to lenders on its panel for the purpose of arranging residential mortgage and other lending products on behalf of clients. Personal and financial information is shared with the relevant lender(s) selected as part of the advice process. The full lender panel schedule is maintained by KAN and is available via their Privacy Policy (see Lender Panel list at the bottom): <https://www.kiwiadvisernetwork.co.nz/about/privacy-policy>

Marketing

Superbloom

Purpose: Superbloom provides marketing strategy, content creation, and campaign management services to EFG. Personal information (such as client or prospect contact details, communication preferences, and engagement data) may be shared with or processed by Superbloom for the purpose of developing and delivering marketing communications, promotional campaigns, and brand content



on EFG's behalf. All marketing activities involving personal information are conducted in accordance with the Privacy Act 2020.

Privacy Officer Contact: holly@superbloom.co.nz

Address: 10 Morocco Terrace, Kelvin Grove, Palmerston North

Website: <https://www.superbloom.co.nz>

Avodah

Purpose: Avodah provides website design, development, and maintenance services for EFG's public-facing website. Personal information collected through the EFG website (including enquiry form submissions, contact details, and device/cookie data such as IP addresses, browser type, and page visit data) may be accessed by Avodah for the purpose of maintaining website functionality, improving user experience, and supporting EFG's digital presence. Avodah may also implement analytics and tracking tools on EFG's behalf in accordance with EFG's privacy policy and cookie disclosures.

Privacy Officer Contact: nathan@avodah.co.nz

Address: 14 Coleman Place, Palmerston North Central, Palmerston North

Website: <https://avodah.co.nz>

Referral Agents

Tower

Purpose: Tower is a referral partner of EFG. Personal information may be shared with Tower for the purpose of referring clients to, or receiving referrals from, Tower's insurance products and services. Any referral is made with client consent and in accordance with EFG's disclosure obligations.

Privacy Officer Contact: Privacy@tower.co.nz

Address: Level 5, 136 Fanshawe Street, Auckland 1142, New Zealand.

Website: <https://www.tower.co.nz/>

Moving hub

Purpose: Moving Hub is a referral partner providing home moving and utility connection services. Personal information (such as name and contact details) may be shared with Moving Hub for the purpose of facilitating a client referral to assist with home moving services, with client consent.

Privacy Officer contact: support@movinghub.com

Address: 2/20 Beaumont Street, Auckland Central, Auckland 1010

<https://www.movinghub.com>

NZ Funds

Purpose: NZ Funds is a referral partner providing investment and wealth management services. Personal information may be shared with NZ Funds for the purpose of referring clients who may benefit from investment or KiwiSaver advice, with client consent.

Privacy Officer contact: info@nzfunds.co.nz

Address: Level 16, 21 Queen Street, Auckland 1010

Website: <https://www.nzfunds.co.nz>

Harness financial

Purpose: Harness Financial is a referral partner providing financial advice services via personal risk insurance. Personal information may be shared with Harness Financial for the purpose of referring clients whose needs fall outside EFG's scope of advice, with client consent.

Privacy Officer Contact: dieter@Savvywealth.co.nz

Address: 5 Tamworth Crescent, Newlands, Wellington, 6037.

Website: <https://harnessfinancial.co.nz>

For questions about how EFG shares your personal information with any of the above parties, please contact the EFG Privacy Officer at lili.r@efgroup.co.nz