

PRIVACY POLICY

JULY 2026



This Privacy Policy outlines how GML Lawyers Limited (“GML”) may collect, store, use and disclose any Personal Information that you provide to us. GML is bound by the Privacy Act 2020 and the Information Privacy Principles set out in that Act. By instructing us to act on your behalf you consent to us collecting, storing, using and disclosing your Personal Information in the manner set out below.

PERSONAL INFORMATION

In this Privacy Policy, ‘Personal Information’ means information relating to an individual which can be used to identify that individual. This includes, without limitation, your name, email address, phone number, postal address, date of birth, occupation and identity documents.

COLLECTION OF PERSONAL INFORMATION

GML collects Personal Information in order to conduct its business, to provide and market its services and to meet its legal obligations, including its obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (“AML/CFT Act”). Where practicable, we will collect Personal Information directly from you. If you do not provide your Personal Information we may not be able to act for you.

USE OF PERSONAL INFORMATION

GML may use and disclose your Personal Information for the following purposes:

1. To communicate with you
2. To verify your identity and conduct customer due diligence as required by the AML/CFT Act
3. To conduct its business
4. To provide and market its services
5. To comply with its legal obligations
6. To help manage and enhance its services.

GML will not use your Personal Information except in accordance with the Privacy Act 2020 or any other relevant legislation.

IDENTITY VERIFICATION

The AML/CFT Act requires GML to verify the identity of its clients and, in some cases, of persons associated with its clients (such as directors, shareholders, trustees and beneficial owners).

We may verify your identity electronically, using trusted third party service providers such as First AML Limited. Electronic identity verification involves checking the identity information and documents you provide (such as your driver licence or passport, and your name, date of birth and address) against records held by third parties, including credit bureaus (such as Centrix), the Department of Internal Affairs, Waka Kotahi NZ Transport Agency and other official sources.

By providing your identity information to us you consent to those checks being undertaken, and to those third parties disclosing relevant information to us and to our service providers, for the purpose of verifying your identity.

Where a check is made against records held by a credit bureau, the check is used solely to verify your identity. It is not a credit check and it does not affect your credit rating.

The AML/CFT Act requires GML to retain the identity records it collects for at least five years after our engagement with you ends.

DISCLOSURE OF PERSONAL INFORMATION

GML will not sell your Personal Information to third parties. Your Personal Information will be used within GML for the above purposes. GML may however disclose your Personal Information if:

1. You have authorised us to do so
2. We have given you notification of the intended disclosure and you have not objected to same
3. The disclosure is to our third party service providers (including identity verification, technology and document storage providers) so that they can provide their services to us
4. The disclosure is to a regulator or supervisor with lawful authority to require it, including the Department of Internal Affairs as our supervisor under the AML/CFT Act and the New Zealand Law Society
5. We believe that the disclosure is reasonably necessary to assist a law enforcement agency or an agency responsible for national security in the performance of their functions
6. We are authorised, required or permitted by law to disclose the information.

By providing us with your Personal Information, you consent to us using and disclosing your Personal Information in the manner set out above.

GML will only disclose Personal Information to a person or agency outside New Zealand in accordance with Information Privacy Principle 12 of the Privacy Act 2020.

MANAGEMENT OF PERSONAL INFORMATION

The Privacy Act 2020 requires GML to take reasonable steps to protect the security of Personal Information. GML's personnel are required to respect the confidentiality of Personal Information and the privacy of individuals.

GML takes reasonable steps to protect Personal Information held from misuse and loss and from unauthorised access, modification or disclosure.

If a privacy breach occurs that has caused, or is likely to cause, serious harm to any individual, GML will notify the Office of the Privacy Commissioner and the affected individuals as required by the Privacy Act 2020.

RIGHT OF ACCESS TO AND ACCURACY OF PERSONAL INFORMATION

GML endeavours to ensure that the Personal Information it holds is accurate, complete and up-to-date. We encourage you to contact us to update any Personal Information held about you.

Subject to the exceptions set out in the Privacy Act 2020, you may request access to, or correction of, your Personal Information which GML holds about you.

GML will require you to verify your identity and specify what information you require. A reasonable charge may in some circumstances be made for providing access. GML will advise you of the likely cost in advance.

COMPLAINTS

If you have any concerns about the way GML has handled your Personal Information, please contact our Privacy Officer in the first instance. If you are not satisfied with our response, you may make a complaint to the Office of the Privacy Commissioner (www.privacy.org.nz or 0800 803 909).

UNSOLICITED ELECTRONIC MESSAGES

To the extent you provide us with an email address, you agree that we may send you commercial electronic messages. You may opt out of receiving these messages at any time by using the unsubscribe facility in the message or by contacting us.

UPDATES TO THIS POLICY

This Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

The most current version of this Policy is located at www.gmllawyers.co.nz.

ENQUIRIES

If you have any questions about privacy-related issues please contact GML's Privacy Officer, Sam Khalesi at sam@gmllawyers.co.nz.