



Sugar Wallet Privacy Policy

1. Overview

- 1.1 We care about your privacy.
- 1.2 This Privacy Policy governs the use of your information by Sugar Wallet. When we say “your information” in this Policy we mean personal information as defined in and protected by the Privacy Act 2020.
- 1.3 This Privacy Policy is intended to help you understand:
 - what information we collect about you
 - how we use your information
 - who we share your information with.
- 1.4 The Privacy Policy covers your information received by us via our Service, Website and App or otherwise.
- 1.5 We reserve the right to amend the Policy at any time, effective upon posting the modified Privacy Policy on our Website. Any amendments will apply to your continued use of our Service, App and Website. We'll tell you when we last updated the Policy at the top of the page.
- 1.6 Please read this Privacy Policy alongside our Terms of Use.

2. Who are we?

- 2.1 In these Terms:
 - ‘we’, ‘us’, ‘our’, ‘Sugar’ or ‘Sugar Wallet’ refers to Sugar Limited, a company incorporated in New Zealand (coy number 8069156, FSP1000077), which provides the Service to you. Our registered office is Unit 324, 28 College Hill, Freemans Bay, Auckland 1011
 - ‘Sugar Nominees’ refers to Sugar Nominees Limited, a company incorporated in New Zealand (coy number 8240801, FSP 1001833), which is responsible for holding client money and assets in trust
 - our ‘Website’ is sugarwallet.com
 - our ‘App’ is the Sugar Wallet App available for download through Google Play and the App Store.



3. Acceptance of this privacy policy

- 3.1 You accept this Privacy Policy and authorise the collection, use, disclosure, storage, and retention of your information by Sugar Wallet as described in this Privacy Policy.

4. Information we collect about you

- 4.1 We collect information you give us as detailed in the table below.

Information you give us	When do we collect it?
Whether you are a first-time investor	Step 1 sign-up prior to you setting up an account
Your full name and contact details (ie email, phone number)	Step 1 sign-up when you set up your Sugar Wallet account or over email as required
Photographic identity document and/or details (including birth date)	Step 2 sign-up when we verify your identity or over email or upload link as required
Tax details (IRD number, PIR tax rate, tax residency status)	Step 2 sign-up after we verify your identity or over email as required
Residential address details and/or proof of address document	Step 2 sign-up when we verify your residential address or over email or upload link as required
Bank account name and number	Step 3 sign-up when you are redirected to Akahu to connect your bank account
Investment details (chosen fund, investment plan start date, amount and frequency)	Step 4 sign-up when you choose how you would like to invest on Sugar Wallet
Nature and purpose of your investment	Step 4 sign-up when you note why you would like to invest on Sugar Wallet
Queries you have about Sugar Wallet	Via you emailing us at hello@sugarwallet.com
Feedback on our Service	Via you emailing us at hello@sugarwallet.com or as responses to surveys we send out via email or SMS
Requests to delete your account	Via you emailing us at hello@sugarwallet.com

- 4.2 You do not have to give us your information. But this may hamper our ability to provide our Service to you.
- 4.3 We collect information about you when you use our Service such as the details of your deposits and withdrawals, changes to your investment



plan and information about how you interact with our Service (eg your IP address, pages visited, when you change your password or log in).

- 4.4 The volume of collection may increase if your activity using our Service has been flagged as unusual or suspicious behaviour with respect to our obligations under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act 2009).
- 4.5 We collect information others give us about you (ie information from third parties). For example from service providers that help us to receive payments from you, or to provide marketing services. The collection and disclosure of that information will be governed by terms you have agreed with those third parties.
- 4.6 We may also collect information about you from publicly available sources.

5. How we use your information

- 5.1 We use your information in accordance with your specific instructions or consent, or in accordance with this Privacy Policy, including for the following purposes:
- to provide our Service to you – including personalizing our service for you and supporting you in using our Service
 - to identify you and your residential address
 - to communicate with you – including via targeted emails, SMS, ads and other content about our Service or services of our partners
 - to improve our customer support and resolve disputes
 - to test, research, analyse and develop our Service – for example to improve the functionality of our App and/or Website. This data may be aggregated with that of others covered under this Privacy Policy.
 - to detect, prevent and protect against fraud and crime, in particular to comply with our obligations under the AML/CFT Act 2009
 - to comply with tax-related obligations, including CRS & FATCA
 - to comply with the Law.
- 5.2 We compare identity and address information you provide during sign-up, against information held by others (eg government agencies) using a third party electronic service. You consent to this electronic verification by using our Service.



5.3 We must comply with our obligations under the Privacy Act 2020 when dealing with your information.

5.4 We will not sell your information to others.

6. Who we might share your information with

6.1 We can share your information our service providers, subsidiaries, business partners, contractors, and professional advisors such as:

- our chosen custodian and sub-custodian who provide client money or client property services relating to your investments
- electronic identity and address verification providers
- name and address matching providers
- bank feed providers
- cloud-storage providers
- marketing partners
- software-as-a-service providers
- data analytics or research partners
- third parties that help us to enhance the safety and security of our service
- where required, to international regulators
- our consultants, lawyers, accountants, and insurers.

6.2 Some of these service providers, subsidiaries and business partners are located outside of New Zealand and may not be subject to New Zealand privacy laws. We will take reasonable steps to confirm that relevant organisations are required to protect the information in a comparable way as those organisations that do fall under the scope of the Privacy Act 2020.

6.3 We can only share the information in the ways described in this Privacy Policy or if it is allowed by Law, for example due to fraud, security, or similar concerns. We can also use and share your information in other ways if you give consent.

6.4 We may share your information if we merge some or all of our business or assets with another company.

6.5 We can use and share information that does not identify you for any purpose.



7. Cookies

- 7.1 Our Service, Website and App may include cookies for a few different reasons. Cookies make it easier for you to use our website in future visits by remembering who you are and retaining your preferences and settings. Cookies also help us to monitor traffic and personalise the content on our website for you.
- 7.2 We can't use cookies to view any data on your device – only the data stored in the cookie. The data stored in the cookie usually does not identify you. Rather it collects information like device type, data, and time of use, referring website, IP address and advertising identifiers.
- 7.3 You can switch off cookies and other tracking services using your browser settings (but it might mean you can't use our website in the same way).
- 7.4 We may allow others to provide analytics, send messages and ads for us, and to track and report on performance. These entities may use cookies and other similar tech to identify your browser or device when you use our Service, as well as when you visit other online sites and services.

8. Retaining and deleting your information

- 8.1 We will keep your information for as long as is necessary to provide our Service to you.
- 8.2 If you cancel your account with us, we will retain your account information unless you request that we delete it from our system.
- 8.3 We may additionally keep your information:
- for as long as you have an account with Sugar Wallet
 - for a minimum of five years (after your account is closed) to comply with regulatory, tax, insurance, and other requirements
 - for as long as we believe necessary for the purposes set out in this Privacy Policy
 - for an indefinite time if we believe necessary, for example for fraud prevention, safety, and security.



9. Security of your information

- 9.1 We're committed to keeping your information safe and secure and we will occasionally implement and update security measures to help protect your information. However, despite our measures, we can't guarantee the security of the transmission or storage of your information.

10. Third Party links

- 10.1 Our Service, Website and/or App may contain links to third party websites. Our terms don't apply to any third party websites. We take no responsibility for the content, operation, or privacy practices of other websites.

11. Contact us

- 11.1 We're here to help!
- 11.2 You can contact our Privacy Officer at hello@sugarwallet.com to:
- withdraw any consents given in relation to the handling by us of your information
 - request access to your information (we may charge a fee)
 - request that we correct information that is inaccurate or out of date
 - opt out of marketing emails
 - complain if you feel we have not met our obligations
 - have any questions or concerns regarding this Privacy Policy.
- 11.3 It is important to us that the information we hold about you is accurate, complete, and up to date. We will take reasonable steps, consistent with our obligations under the Privacy Act, to correct or update that information if you so request. In cases where we cannot fulfil your request, we will explain why we have made that decision.