

Privacy Notice

We recognise that your privacy is important.

If you seek to purchase an Occupation Right from us, you will need to provide us with personal information and authorise us to obtain information about you from third parties. We may also gather information about you from public sources.

This privacy notice sets out how Peakviews Village Limited and Tumu Lifestyle Limited collects, uses, holds and shares your personal information.

References to “we”, “our” and “us” means Peakviews Village Limited and Tumu Lifestyle Limited and our related entities. References to “Tumu Group” means Tumu Merchants Limited and its related entities including its shareholder and shareholder’s related entities.

We will comply with the Privacy Act 2020 and any other applicable laws relating to our use of your personal information.

What Types of Information Do We Collect?

We collect information about you to manage and conduct our business, to provide and market our products and services and to meet our legal obligations. The amount and type of personal information we collect and hold about you will vary depending on the nature of our relationship with you.

The information we collect may include:

- your name, address, email and telephone number and preferred name
- name and contact details for one or more emergency contacts
- identification data such as date of birth
- documentation required to comply with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 in order to verify your identity (such as the identification data listed above and also trust deeds and statements of source of wealth or funds)
- documentation required to comply with the Retirement Villages Act 2003, Retirement Villages (General) Regulations 2006 and the Retirement Villages Code of Practice 2008 including legal details such as confirmation you have a Will in place, copies of your enduring powers of attorney and your lawyer’s contact details
- financial information including bank account details to enable us to make authorised deductions such as fees or other payments due to us
- details of any pets you have
- biometric information such as photographs
- your GP and/or specialist’s contact details, GP approval for you to live independently, and your NHI number in case emergency assistance is required
- CCTV footage, access logs, visitor logs to ensure safety of all residents in our Villages
- incident/accident reports and records of welfare checks
- any complaints you may have made about us or others in the Village, or that may have been made about you by our staff or other residents
- behavioural information including how and where you use and interact with our website and digital platforms (the “**Platforms**”)

Collection of Information Directly From You

We collect information directly from you when you interact with us. This includes providing us information via:

- Forms including application forms
- Meetings, interviews, telephone calls, emails and other correspondence
- Entering competitions and promotions that we run
- Use of our Platforms as per our Platform Use Policy
- Responding to surveys that we undertake

Please note that we may sometimes use AI as a note-taking tool to record meetings or telephone conversations you have with us. We will let you know at the start of the meeting or call if we are intending to do this and if so, we will offer to send you a copy of the notes for your records too.

Collection of Information About You From Other Sources

We may collect information about you from other sources including:

- People and organisations acting with or for you, or advising you, such as:
 - Your accountant, lawyer, trustees or executors
 - Your family members, appointed attorneys or other legal representatives
 - Your GP, pharmacist and health assessors or other hospital or ambulance staff
- People and organisations that we work with, such as:
 - Any other entities in the Tumu Group that have had dealings with you;
 - The statutory supervisor for the Village (if any).
 - Service providers such as AML service providers, marketing companies, cloud service providers or data analysis companies
 - Credit reporting agencies
 - Third party digital platforms like Facebook, Google
 - Debt recovery agencies
 - Any other entities that help us manage our business
- Other organisations or people, such as:
 - Previous accommodation, support or care providers
 - Other residents or members of the public who raise issues with us
 - Police, emergency services, regulators, Courts or Tribunals
 - Any person or entity raising, or assisting us to investigate, any concerns or complaints or manage a legal action
- Public sources, such as:
 - News articles
 - Social media content

Information you provide about others

Where you provide us with the names and contact details of any other people, you confirm that you have their permission to provide us with this information and for us to hold and use it for the purposes set out in this privacy notice.

Your Rights

You have rights of access to and correction of personal information that we hold. This can be done by contacting us by email at privacy@tumu.co.nz or by mail at the address set out in the Contact Details section below.

Not providing Information

If you choose not to provide us with some information, or prevent us from obtaining information from third parties, we may not be able to provide you with an Occupation Right, respond to your queries or provide you access to our Platforms.

Use of Information

We use your information:

- to communicate with you
- to verify your identity
- to assess your requirements, needs, health status and whether our services are appropriate for you
- to monitor whether your health or cognitive capacity remain appropriate for our services
- to arrange urgent medical assistance when required
- to conduct appropriate checks for creditworthiness
- to comply with our legal obligations and enforce our legal rights under the Occupation Right entered into between you and us
- subject to your consent under the Unsolicited Electronic Messages Act 2007, marketing and promoting our products and services to you, including contacting you electronically (eg by text or email)
- to help us manage and improve our products and services
- ensuring the integrity, safety and security of our Villages including complying with our obligations under the Health and Safety at Work Act 2015
- to resolve and respond to complaints
- to improve our Platforms and conduct data analysis, surveys and market research

Information Sharing and Disclosure

You agree that we may disclose your personal information:

- a) within the Tumu Group of companies for marketing purposes
- b) to the statutory supervisor for the Village (if any) so that it can carry out its supervisory functions
- c) to your GP or specialist or other emergency medical personnel if required in the event of an emergency or if your health or cognitive capacity is of concern to us
- d) to the District Health board where we are required to do so
- e) to our staff to enable them to provide our services to you
- f) to our contractors, suppliers and other third parties to enable them to provide services and products to us and you, including in relation to the Platforms;
- g) to your authorised representatives to enable them to manage their responsibilities to you and facilitate your care
- h) to Government agencies, statutory supervisors and regulatory bodies or other third parties where we are authorised or required to do so by applicable law
- i) to agents, contractors, service providers and prize suppliers to conduct any promotion or competition we are running
- j) by sharing aggregated demographic information (in a form in which you will not be identified) about our user base with our partners;
- k) when we believe it is appropriate to comply with applicable law, facilitate court proceedings or to protect our rights.

Marketing

From time to time, we may contact you to provide you with information about products, events and services provided by us or another entity within the Tumu Group. If you provide us with your email and mobile number, you agree that we may send you this marketing via electronic messages (e.g. texts and emails). However, you can withdraw your consent at any time by opting out in the marketing email itself or by contacting us using the details below.

Storage of Information

We will protect your personal information using security safeguards that are reasonable in the circumstances to prevent the loss, unauthorised access, use, modification or disclosure of your information.

The information we hold is stored primarily on SaaS systems hosted in New Zealand and Australia, which are our preferred locations. We may also use some SaaS systems that are hosted in the USA or Europe where solutions cannot be found in our preferred locations. You can contact us at our address set out in the Contact Details section below.

All our service providers and contractors are contractually obligated to protect your information using such security safeguards as are reasonable in the circumstances against loss, unauthorised access, use, modification or disclosure and any other misuse. They may use your information if required to perform their respective services and have contracted with us to prevent unauthorised use and unauthorised disclosure of the information.

How long we hold your information

We will not hold your personal information for longer than is required for the purposes for which it was collected. However, this is subject to any obligations at law requiring us to hold your information for minimum periods. In general, we will hold your information for the duration of our business or contractual relationship with you and for up to two (2) years after our business or contractual relationship with you ends.

We may retain non-personal data for as long as we have a business need to do so.

Changes in the Privacy Notice

We may make changes to our privacy notice or alter our Platforms' functionality from time to time. Any changes made will be updated in this privacy notice accordingly, so we encourage you to review this notice for the latest information on our privacy practices.

Contact Details

If you have any questions about our privacy notice, or any other matter, or you wish to withdraw your consent to this Privacy Notice to the extent applicable laws provide you this right, please feel free to contact us. You can reach us in one of the following ways:

Email: privacy@tumu.co.nz

Phone: 06 872 6200

Mailing Address: Privacy Officer, PO Box 2308, Hastings, New Zealand 4156

Complaints

If you wish to make a complaint about our handling of your personal information, you should first contact us directly using our contact details above. We will respond to you in accordance with applicable laws. If you are not satisfied with our response, you may be able to complain to the Office of the Privacy Commissioner.