

# Frank Advice Limited & FrankCapability Limited (FrankGroup)

## Privacy Statement

Frank Advice Limited & FrankCapability Limited (**FrankGroup**) recognises the importance of protecting your privacy.

### 1. Introduction

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#### 1.1 Overview

This Privacy Statement explains how FrankGroup may collect, hold, use and disclose information that identifies you or individuals that you represent (your **personal information**). If you would like to contact us in relation to this Privacy Statement or our use of your personal information, please email us using the details set out in the Contact Us section below. Please read this Privacy Statement carefully. It applies to any personal information that you provide to FrankGroup or authorise us to collect.

**By providing FrankGroup with your personal information, or by using our digital courses or other services, you authorise us to collect, use and disclose your personal information in accordance with this Privacy Statement.**

**If you provide us with, or authorise us to collect, personal information about another individual (for example, names and contact details of individual users of our services where you are booking courses), you confirm that they have authorised you to provide us, or authorise us to collect, their personal information in accordance with this Privacy Statement and that you have informed them of their rights to access and request correction of their personal information, as set out below.**

#### 1.2 Updates to this Privacy Statement

We may update this Privacy Statement at any time by posting an updated version of this Privacy Statement on our website (available at: <https://www.frankgroup.co.nz/>). The updated version of this Privacy Statement will take effect immediately upon publication (or, if applicable, on the date specified in the updated Privacy Statement) and will apply to all personal information that we hold about you. If the changes are material, we may also take additional steps to bring the changes to your attention, including by notifying you directly. We will update you of any material changes as required by law.

#### 1.3 Additional rights and obligations

This Privacy Statement applies in addition to, and does not limit, our rights and obligations under the Privacy Act 2020 (as amended or replaced from time to time) (**Privacy Act**) or any specific authorisation that you provide to us when you interact with us or use our services.

You are not required to provide us with any personal information that we request. However, if you do not do so, we may not be able to provide certain services to you.

#### 1.4 Important Notice: New Zealand residents

Our website, digital courses and other services are intended for use by (a) New Zealand residents and (b) residents in other jurisdictions where we have expressly agreed to provide these to you in another jurisdiction. It is important that we know if you are located in another country as you may be subject to other laws, including data protection laws.

## 2. Collection of personal information

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### 2.1 Types of personal information we collect

The personal information we collect will vary depending on the services that you use, and your interactions with us. For example, we may collect details relating to an individual's:

- name, work mobile number and work e-mail addresses;
- demographic information, such as gender and location or city of residence;
- information relating to the individual's relationship with FrankGroup, for example whether you are using our digital courses and how many courses you have attended
- information relating to the individual's participation in our digital courses, including course completion rate and course work that you submit to us for feedback
- feedback that individuals provide.

### 2.2 Cookies

FrankGroup also collects information through our website and digital courses through cookies. Cookies are small pieces of information that are stored on a user's computer. We may use cookies to personalise your experience on our website or digital courses, make it easier for you to navigate our website or digital courses, and improve your experience by storing your search, posting and application history, and, if we develop log-in functionality, your login details. Cookies can be disabled via your web browser, however doing so may limit your access to some of the website's or digital courses' content and features. We may use cookies to track non-personally identifiable information such as usage and volume statistics for research purposes in order to further develop our website and digital courses.

## 3. Use of personal information

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FrankGroup may use an individual's personal information for the following purposes:

- for the general operation of FrankGroup and our relationship with you or individuals you represent - including providing you with products or services that you have requested; and
- for any other purpose authorised by you, individuals you represent or permitted by law.

We also use aggregated and anonymous information (where identifiable characteristics are removed, so that you will remain anonymous) for statistical and research purposes.

We may communicate with you or individuals you represent by email and other electronic means. If we communicate with you for direct marketing purposes, we will provide you with a choice to opt-out of any of our marketing communications.

We may take and use photographs and testimonials for marketing purposes (including in social media), with your express consent.

## 4. Disclosure of personal information

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### 4.1 Disclosure to third parties

FrankGroup may share personal information with the following parties:

- any related companies and organisations, partners, contractors and service providers (including IT services providers), for the purposes set out above and to assist us with the operation of FrankGroup;
- if you are a user of our Services (e.g., digital courses), with the organisation that has arranged your training; and
- any other party authorised by you, individuals you represent, or to whom we are required or authorised to disclose personal information in accordance with applicable law.

### 4.2 Overseas disclosure

If we do send personal information overseas either directly or via a third party, we will ensure that any such transfer of personal information will only be undertaken in compliance with applicable laws, including the Privacy Act.

## 5. Storage of personal information

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### 5.1 Storage

Personal Information that we collect is either held by us at our head office (refer to the Contact Us section below) or on our behalf. For example, some information we hold will be stored in “the cloud” in secure databases on our behalf by third parties based overseas.

### 5.2 Security

Security of your information is very important to us. We will take reasonable technical and organisational precautions to protect personal information that we hold. However, due to the inherent nature of the internet, we are not able to guarantee the security of any information that we hold or that you transmit to us.

### 5.3 Updates

We rely on you to update us if your contact details, or the contact details of the individuals you represent, change (please refer to the Contact Us section below).

## 6. Access and correction of personal information

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Under the Privacy Act, you and individuals you represent have the right to access and request correction of any personal information that we hold relating to you or the relevant individual. Please refer to the Contact Us section below.

## 7. Contact us

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If you have any questions or requests relating to this Privacy Statement or personal information that we may hold about you or individuals that you represent, please contact us at:

FrankGroup  
E-mail: [hello@frankgroup.co.nz](mailto:hello@frankgroup.co.nz)

This Privacy Statement was last updated in July 2024.