

Privacy Policy

This policy explains how Base Law collects, holds, uses and shares personal information, and the rights you have in relation to it. We are bound by the Privacy Act 2020 and the information privacy principles set out in the Act. Personal information is any information about an identifiable individual.

In this policy, "we", "us", and "our" refer to Base Law Limited. "You" and "your" refer to any individual whose personal information we collect or hold, such as our clients and prospective clients, other parties to or people connected with a client's matter, our suppliers and their staff, and job applicants.

1. The information we collect

Most of the personal information we hold comes from the work you ask us to do. Depending on your matter, the personal information we collect may include, but is not limited to, the following:

- contact details
- date of birth
- gender
- financial details
- employment information
- identity documents
- account details
- legal matter information
- third-party information
- IRD number and tax residency information
- family and relationship details
- health information, where relevant to a will or enduring power of attorney

As a reporting entity under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (**AML/CFT Act**), we must carry out customer due diligence on our clients and on certain people connected with them, such as beneficial owners, trustees and people acting on a client's behalf. This means we collect customer due diligence information, including identity and address information and, in some cases, information about the source of funds or wealth. Some of this information may be obtained through electronic identity verification carried out by our verification provider, Centrix (see section 3A).

2. How we collect your information

We usually collect personal information directly from you, whether in person, by phone or email, through our website, or through our client onboarding and identity verification process. If we ask for personal information and you choose not to provide it, we may be unable to act for you. In some cases, the law will not allow us to act without it.

3. Information we collect from other sources

We sometimes need to collect personal information about you from someone other than you. In residential property and estate matters, this is a normal part of the work. The sources we collect from include the lawyers acting for other parties, real estate agents, banks and other lenders, co-borrowers and guarantors, accountants, trustees and executors, Land Information New Zealand, local councils, the Companies Office, the Personal Property Securities Register, courts and tribunals, and our identity verification provider.

Information Privacy Principle 3A (IPP3A) of the Privacy Act 2020 requires us to take reasonable steps to make sure you know when we have collected your personal information from another

source. Where IPP3A applies, we will tell you that we have collected your information and why, who we intend to share it with, that Base Law collected and holds it, any law that authorised or required the collection (such as the AML/CFT Act), and your rights to access and correct your information. This policy is one of the ways we do that.

In some situations, an exception under IPP3A applies, and we will not notify you. Examples include where you have already been made aware of these matters (including through this policy), where the information is publicly available, where not notifying you would not prejudice your interests, where notifying you would prejudice the purpose of the collection, where it is not reasonably practicable to notify you, and where another New Zealand law, including legal professional privilege and our duty of confidentiality to our clients, means the notification should not be made.

3A. Centrix identity verification

Base Law uses Centrix Group Limited ("Centrix") as part of our electronic identity, residential address verification and AML/CFT compliance processes. We may provide your personal information to Centrix, and obtain information from Centrix, for electronic identity verification, residential address verification and AML/CFT compliance purposes.

Centrix may collect, use and disclose your information in accordance with its Privacy Statement. You have the right to access and correct information held by Centrix.

Details of how Centrix handles your personal information can be found at: www.centrix.co.nz/privacy

4. How we use your information

We use personal information to verify your identity, provide legal services and complete your matter, and communicate with you. We also use it to invoice you and collect payment, including carrying out credit checks where it is reasonable to do so, and to operate our trust account.

We use personal information to meet our legal and professional obligations, including under the AML/CFT Act, the Lawyers and Conveyancers Act 2006 and tax reporting laws, and to protect and enforce our legal rights.

We will not use or share your personal information for any other purpose without your authorisation, unless the law requires or permits us to.

5. Who we share your information with

Completing a legal matter usually involves sharing some of your personal information with others. Depending on your matter, this may include the other party's lawyer, your bank or lender, real estate agents, Land Information New Zealand, Inland Revenue, local councils, the Companies Office, courts, KiwiSaver providers, insurers and government agencies.

We also share personal information with the providers that support our practice, such as our practice management, document storage, IT support and identity verification services, and with debt collection agencies if we need to recover money owed to us. Some of these third-party providers store information outside New Zealand (see section 6).

We may also be required to disclose personal information where there is a legal or professional duty to do so, for example, under the AML/CFT Act, the Common Reporting Standard (CRS) or the Foreign Account Tax Compliance Act (FATCA). Where it is reasonable to do so, we may also disclose your name and address to credit reporting agencies.

6. Overseas disclosure

Some of our third-party service providers may store or process information outside New Zealand. Where we disclose information overseas, we take reasonable steps to make sure it is protected by safeguards comparable to those in the Privacy Act 2020, or we obtain your authorisation where the law requires it. Personal information may be processed in:

- Australia
- United States
- Other jurisdictions used by our service providers

7. Our use of technology and AI

We use technology tools, including generative artificial intelligence (AI) tools, to help with tasks such as legal research, drafting, document review and summarising. Where these tools process personal information, we only use tools that we are satisfied meet appropriate standards of confidentiality, privacy and security, and we do not enter client information into publicly available AI tools that use it to train their models. Any AI output used on your matter is checked by the lawyer responsible for your matter or a person they supervise, before it is relied on. If you would prefer that we not use AI tools for your matter, please let us know in writing.

We may record or transcribe phone and video calls with you so we have an accurate record for your file. We will always ask your permission before recording, and you are free to say no.

Our use of these tools is consistent with our duties of confidentiality, legal professional privilege, the Lawyers and Conveyancers Act (Lawyers: Conduct and Client Care) Rules 2008 and the Privacy Act 2020.

8. Storage, security and retention

We hold personal information electronically in systems that require logins and are restricted in access, and, in limited cases, in hard copy. We take all reasonable steps to protect it from loss, misuse and unauthorised access or disclosure.

We retain personal information for as long as is necessary for the purpose for which it was collected, or as required by law or our professional obligations. Base Law will retain information generally as follows:

- Client matter files are kept for at least 7 years after our engagement ends, or longer where the law or the nature of the matter requires it.
- Authority and identity evidence for electronic land transfer dealings is kept for at least 10 years from the date of lodgement, as required by the Land Transfer Act 2017.
- AML/CFT records are kept for at least 5 years after our business relationship with you ends, as required by the AML/CFT Act.
- Original wills, enduring powers of attorney and deeds held in safe custody are kept until we release them on proper authority.

- Information that is no longer required is securely destroyed or de-identified.

9. Privacy breaches

We maintain an internal register of all privacy breaches. Where a privacy breach has caused, or is likely to cause, serious harm, we will notify the Office of the Privacy Commissioner and affected individuals as required by the Privacy Act 2020. If you believe your personal information has been compromised, please contact our Privacy Officer immediately.

10. Your rights: access and correction

You have the right to ask for a copy of the personal information we hold about you, and to ask us to correct it, subject to the withholding grounds in the Privacy Act 2020. To make a request, please contact Base Law's Privacy Officer. We will respond to access and correction requests as soon as reasonably practicable and within 20 working days, unless the Privacy Act permits a longer response period. If we cannot give you the information you have asked for, we will tell you why.

11. Complaints

If you have a concern about how we have handled your personal information, please contact our Privacy Officer in the first instance. We will acknowledge your complaint within 5 working days and aim to resolve it within 20 working days. If you are not satisfied with our response, you may complain to the Office of the Privacy Commissioner:

- Website: www.privacy.org.nz
- Phone: 0800 803 909
- Online complaint form: www.privacy.org.nz/your-rights/making-a-complaint

12. Contact: Privacy Officer

For any privacy-related queries, access or correction requests, or complaints, please contact our Privacy Officer:

Kate von Biel

Director / Base Lawyer

B1 Block, Pohutukawa Coast Shopping Centre, 40 Kouka Road, Beachlands, Auckland 2018

kate@baselaw.co.nz

13. Updates to this policy

We review this policy from time to time, including when the law or our practice changes. The current version will always be available on our website. This policy was last updated on 8 October 2026.