



# Disclosure Information

Smart Brokers Limited (FSP327666) trading as SMART is the Financial Advice Provider and holds a licence issued by the Financial Markets Authority to provide financial advice.

## About us

SMART is a New Zealand based online financial advisory business and was established in 2007. We are licensed to provide advice about finance, insurance and wealth. Our team works nationwide to help New Zealanders achieve their financial goals.

We are committed to ensuring that your financial goals and needs are met in accordance with best practice. Our Financial Advisers will always:

- give priority to your interests by taking all reasonable steps to make sure our advice isn't materially influenced by our own interests
- exercise care, diligence, and skill in providing you with advice
- meet standards of competence, knowledge and skill set by the Code of Professional Conduct for Financial Advice Services (these are designed to make sure that we have the expertise needed to provide you with advice)
- meet standards of ethical behaviour, conduct and client care set by the Code of Professional Conduct for Financial Advice Services (these are designed to make sure we treat you as we should, and give you suitable advice)

Please visit our website for further information about SMART [www.smartbrokers.co.nz](http://www.smartbrokers.co.nz)

## What We Do

Our financial advisers are able to provide financial advice in relation to the following:

### Finance

- Residential Loans
- Refinancing
- Debt Consolidation
- Personal Loans
- Business Loans
- Commercial Property Loans
- Review Existing Loans
- Money Management

### Insurance

- Life Insurance
- Trauma Insurance
- Income/Mortgage Protection Insurance
- Permanent Disability Insurance
- Medical/Health Insurance

### Wealth

- KiwiSaver

## Who We Work With

At SMART we maintain contractual relationships to enable us to place business with the following reputable lenders, insurance companies and investment companies to be able to provide financial advice about their products.

### Insurance Companies

Accuro  
AIA

Cigna  
Fidelity Life

NIB  
Partners Life

### Banks

ANZ  
BNZ

Westpac  
The Co-operative Bank

SBS Bank

### Non-Bank Lenders and Finance Companies

ASAP Finance  
Avanti Finance  
Basecorp Finance  
Bluestone  
Cressida Capital  
DBR Finance

Finance Direct  
First Mortgage Trust  
Heartland Bank  
Liberty Financial  
Lock Finance  
NZCU Baywide

Pepper Money  
Plus Finance  
Prosopa  
Resimac Home Loans  
Sovereign Home Loans  
Southern Cross Finance

### Wealth

Generate

We periodically undertake reviews of the supplier companies to ensure that the companies we choose to work with are able to meet the needs of our clients and align to our core values.

## How We Get Paid

For loans, SMART and the financial adviser receive commission from the bank or lender with whom we arranged the loan.

If you decide to take out the loan, the bank/lender will pay a commission to SMART and your financial adviser. The amount of the commission paid is based on the amount of the loan amount borrowed.

Where a lender does not pay a commission for the placement of business a fee is then payable based on the percentage of the borrowings. The Fee will be disclosed at the time the advice is provided and can be added to the loan and will be paid to SMART at the time the loan is drawn.

For life and health insurance, SMART and the financial adviser receive commission from the insurance companies on whose policies we give advice. If you decide to take out the insurance, the insurer will pay a commission to SMART and your financial adviser. The amount of the commission is based on the amount of the premium.

For KiwiSaver, SMART and the financial adviser receive commission from the provider of whom we arrange your KiwiSaver with. If you decide to go ahead, the provider will pay SMART and your financial adviser a commission for new applications and the balance amount.

SMART receives an ongoing commission for any fire and general insurance referrals which result in a policy being issued.

SMART pays commission received to the relevant Financial Adviser whilst retaining a portion of this commission for marketing, lead generation, compliance support, training, administration support and any other general expenditure in the course of running a business.

## How Much Does Our Service Cost?

All initial consultations with SMART do not bear any up front professional service fees. By doing so, we believe that we can help more New Zealanders achieve their financial goals.

For any Loans and Finance SMART may charge a fee for the financial advice provided under the following circumstances

- If the loan is less than \$200,000
- If we obtain a pre-approved loan offer that meets your specified needs and then you decide not to proceed with the offer through us
- A cancellation fee for the financial advice provided to a client If the loan is repaid in full or part or re-financed within two years of inception

For any Insurance SMART may charge a cancellation fee for the financial advice provided to a client where the client cancels or reduces a life or health insurance policy within two years of inception.

Generally any fees payable for Insurance or Lending related work are to compensate for the costs associated with providing the advice and the time taken by a SMART Financial Adviser.

The manner in which any fee is payable will be advised at the time advice is provided to the client.

# Conflicts Of Interest And Incentives

From time to time, product providers may invite us to their own sponsored events or give us tickets for events, gifts or other incentives.

To ensure that our financial advisers prioritise the client's interest above their own, they follow an advice process that ensures the recommendations are made on the basis of the clients goals and circumstances.

All our financial advisers undergo regular training about how to manage conflicts of interests. We maintain registers of conflicts of interest, and the gifts and incentives we receive.

SMART monitors these registers and provides additional training where necessary.

SMART undertakes an audit and review of our compliance programme annually through a reputable compliance adviser.

### Not satisfied with our financial advice service?

At SMART we always try to do our best by our clients and prospects, we recognise that we may not always get things right.

If you are not satisfied with our financial advice service you can lodge a complaint via email [info@smartbrokers.co.nz](mailto:info@smartbrokers.co.nz), or phone 0800 405 801.

When we receive a complaint, we will consider it following our internal complaints process:

- We will consider your complaint and let you know what the next steps are within 10 working days. We may need to contact you to get further information.
- We aim to resolve complaints within 8 weeks of receiving them. If we can't, we will contact you within that time to let you know we need more time to consider your complaint.
- We will contact you by phone or email to let you know whether we can resolve your complaint and how we propose to do so.

If we can't resolve your complaint, or if you aren't satisfied with the way we propose to do so, you can contact Financial Dispute Resolution Service (FDRS).

FDRS provides a free, independent dispute resolution service that may help investigate or resolve your complaint, if we haven't been able to resolve it to your satisfaction.

You can contact FDRS by emailing [enquiries@fdrs.org.nz](mailto:enquiries@fdrs.org.nz), or calling 0508 337 337. You can also write to them at Freepost 231075, PO Box 2272, Wellington 6140.



## Privacy Policy

SMART is committed to ensuring that your personal information is protected and to comply with the Privacy Act 2020 (or any successor legislation) (the **Privacy Act**) and all other applicable laws.

This Privacy Policy applies in addition to, and does not limit, our rights and obligations under the Privacy Act and other applicable laws.

This privacy policy sets out how we collect, use, disclose and protect any information that you give to SMART when you visit our website, [www.smartbrokers.co.nz](http://www.smartbrokers.co.nz), or when you access our products and services.

By continuing to engage us or use our website you will be deemed to have accepted the updated Privacy Policy.

References in this Privacy Policy to "You/Your" means you, the user of this website. "We/Us/Our" means SMART Brokers Ltd trading as SMART who provide this website.

## What Information We Collect

We only collect personal information provided by you for the purpose of providing financial advice and through the use of our website. You can access our website without disclosing any personal information about you.

The type of personal information we may collect:

- Your name, email, contact number and other information you provide directly to us or through our website/s
- Information to verify your identity, financial position, assets, employment status for providing financial advice
- Information about your browsing activity when you visit our website.
- We will not keep your personal information longer than is required for the purposes for which the information may be lawfully used.

## Why We Collect The Information

- We use your personal information to respond to your requests or inquiries.
- We use your personal information to provide financial advice and services to you
- We may email you communications, direct marketing and other information using the email address(s) which you have provided, about products and services we think may be of interest to you.
- We may contact you by email or phone about our products and services to market these to you.
- We may contact you by email or phone for market research purposes to improve our website/s, products and services.
- We may contact you for any other purpose authorised by you or the Privacy Act.

If you do not wish to receive marketing information, you may 'opt out' at any time by notifying us at [info@smartbrokers.co.nz](mailto:info@smartbrokers.co.nz).

## Who We May Disclose Your Personal Information To

We may disclose your personal information to the following people if we consider it necessary to do so for the purposes of providing products and services to you:

- SMART and its adviser's, contractors and administrators who provide a service on your behalf
- Product Providers, service providers, other third parties or other intermediaries in relation to the services or products you have engaged us for
- Our referral partners who can help you with other services
- Investors, or any entity that has an interest in our business or any entity to whom we consider assigning or transferring any of our rights or obligations or selling all or part of our business
- Anyone who we are legally required or authorised to share your information with, including regulators and government agencies
- To auditors to ensure we are providing services to you that are in your best interests, and in accordance with current laws and regulations
- Credit reporting and identity verification agencies, as required
- Any other person or entity authorised by you or the Privacy Act

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that the person or organisation has a commitment to protecting your personal information at least equal to our commitment.

## Anti-Spam Policy

We hate spam more than anyone and promise never to send unsolicited email. We will not sell names to any party and you will always have the opportunity to unsubscribe if we are not able to offer amazing value.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We rely on third party data storage providers for the majority of the information we store. We do this only where we believe the third party data storage provider can keep your information safe and secure. Any information held directly by us will be held securely.

## Accessing or Correcting Your Personal Information

Under New Zealand privacy law you are entitled to request access to, and correction of, the personal information we hold about you. If you wish to make either of these requests please email us at [info@smartbrokers.co.nz](mailto:info@smartbrokers.co.nz). We may charge a fee for our reasonable costs of retrieving and supplying the information to you.

There are some circumstances under the Privacy Act 2020 where we may choose not to provide you with some or all of the personal information we hold about you, or to correct your information as you have requested. If that occurs we will write to you and tell you why we have reached that decision.

## Changes To This Privacy Statement

Please take the time to review this Policy regularly as we may review it and make changes to reflect changes in legislation, codes of practice, our business, and the products and services we provide to you.

If you have any questions on our Privacy Policy or your personal information please contact us at [info@smartbrokers.co.nz](mailto:info@smartbrokers.co.nz).

This Privacy Policy was last updated on **15 March 2021**.

You can access our full Privacy Policy at <https://www.smartbrokers.co.nz/privacy-policy/>