PRIVATE
BUYERS

Privacy policy and collection notice for property enquiries.

This New Zealand privacy policy explains how Private Buyers collects, uses, stores, shares, protects, and disposes of personal information across property enquiry forms, direct emails, referrals, private buyer review, and follow-up correspondence — and the rights every person has over that information.

VERSION	2026-07-02 v9
FRAMEWORK	New Zealand Privacy Act 2020, including collection notices, referral and indirect-collection notification rules in force from 1 May 2026, notifiable privacy breaches, overseas disclosure safeguards, and the Unsolicited Electronic Messages Act 2007
PRIVACY CONTACT	The Privacy Officer, Private Buyers — privacy@privatebuyers.co.nz or enquiry@privatebuyers.co.nz
APPLIES TO	Property owners, authorised contacts, referrers, general website contacts, approved investor and portal users, and anyone else whose personal information is provided to Private Buyers
STATUS	Public privacy policy and collection notice for private property enquiry handling; general information, not legal advice to readers

Approved for publication by Private Buyers on 2 July 2026. This policy is effective by publication and internal approval record. Private Buyers maintains a designated Privacy Officer as required by section 201 of the Privacy Act 2020; the Privacy Officer can be reached through the contact details in this policy.

1. Who we are and what this policy covers

Private Buyers is a privately operated New Zealand property acquisition service. We receive property information from owners and referrers, review it privately against practical investment criteria, and — only where there is a possible fit and clear permission — introduce the opportunity to a small approved group of private investors and purchasers.

Private Buyers is a New Zealand "agency" for the purposes of the Privacy Act 2020. This document is both our privacy policy and our practical collection notice. It is written for New Zealand property owners, referrers, and authorised contacts, and it explains the commitments we make when information is collected directly from you or from another source. New Zealand's indirect-collection notification rules have applied since 1 May 2026; section 7 explains how we handle referrals under those rules.

Private Buyers is not a public listing service, licensed real estate agency, valuation service, law firm, lender, or financial adviser, and nothing in an enquiry or review creates an offer, valuation, or agency relationship. Submitting information costs nothing and commits the sender to nothing.

2. Our commitments at a glance

01 **Nothing is published.** Property details submitted to Private Buyers are never placed on a public website, social channel, or listing platform. Review is private.

02 **Permission before sharing.** Contact and property details are shared with potential investors or purchasers only where there is a possible fit and the owner's permission is recorded.

03 **Only what we need.** We collect the information reasonably necessary to assess and respond to a property enquiry — nothing speculative and nothing unrelated.

04 **Answer within 48 hours.** Genuine, adequately detailed property enquiries receive a clear first response, follow-up question, or no-fit answer within 48 hours.

05 **Time-limited retention.** Information is kept against the schedule in section 11 and is deleted or de-identified when no longer needed.

06 **Your information, your rights.** You can request access, correction, sharing withdrawal, or stop-contact at any time; we respond within 20 working days.

07 **Accountable handling.** A designated Privacy Officer oversees requests, complaints, and breach response, and this policy is version-controlled and reviewed.

3. What we collect

Depending on what you choose to provide, we collect:

- **Contact details** — name, email address, phone number, town or region, and your relationship to the property (owner, authorised contact, or referrer).
- **Property details** — address or area, property type, occupancy and tenancy status, rent, price expectation, timing, agency or listing status, and honest condition notes.
- **Photos and documents** — property photos, photo links, and any rates, insurance, council, valuation, title, tenancy, or renovation documents you voluntarily supply. Supplied files may contain embedded metadata such as capture time or location; we do not use photo metadata for any purpose other than enquiry review.
- **Correspondence** — form messages, emails, call and message notes, referral information, and follow-up history.
- **Campaign and technical data** — the QR code, flyer, advertisement, or link that brought you to us (source and UTM parameters), form submission metadata, and the security and delivery logs generated by our hosting and email providers.
- **Review records** — our internal screening notes, deal calculations, status updates, and correspondence logs relating to your enquiry.

> **Please do not send identity documents, bank account details, health information, or other sensitive material unless we specifically request it for a lawful transaction step. If sensitive or irrelevant information arrives unrequested, we restrict access to it and remove it from working records where practical.**

4. How we collect information

- **Directly from you** — through the website enquiry form, the general contact form, direct email, phone, text message, or follow-up conversation. Direct collection is always our preferred path.
- **From referrers** — where someone tells us about an owner or property they believe may suit a private sale. Section 7 explains how referred people are notified.
- **From publicly available property sources** — such as council rating information, QV and comparable-sales tools, mapping and street-imagery tools, and title records, used only to assess a property that has been put to us.
- **Automatically** — limited technical information generated when you use the website, described in section 9.

5. Why we collect it and how we use it

We collect personal information only for purposes connected with our function as a private New Zealand property acquisition service, and we use it only for those purposes or directly related purposes:

Responding to you

Acknowledging receipt, answering questions, requesting missing details or photos, and providing a clear first response within the stated 48-hour window for detailed property enquiries.

Assessing suitability

Reviewing value, rent, rates, insurance, condition, repair risk, timing, and funding fit against practical buyer criteria to decide whether a direct conversation is worth progressing.

Preparing private review material

Creating internal notes, deal calculations, and — where permission is recorded — a private investor review file containing the photos, assumptions, and numbers an investor needs.

Operating the service

Maintaining enquiry records, preventing duplicates and misuse, measuring which campaigns produce genuine enquiries, securing our systems, and meeting record-keeping, accounting, tax, insurance, legal, and dispute-management obligations.

We do not sell personal information, rent contact lists, or trade leads to third parties, and we will not do so under this policy.

6. Collection notices — what you can expect at the point of collection

Whenever we collect information directly from you, we make the following clear at or before the point of collection: that information is being collected; why; who may receive it; that providing it is voluntary; what may happen if core details are missing; that Private Buyers holds it; and how to make a privacy, access, or correction request.

On our website forms, the privacy summary and a link to this policy are displayed at the point of collection, and the confirmation checkbox stays locked until the summary has been opened and scrolled. For direct emails, our acknowledgement points the sender to this policy and asks for any missing authority or sharing permission before the enquiry progresses.

7. Referrals and information collected from another source

Referrers must have permission before submitting another person's contact details or property information. When we receive personal information from someone other than the person concerned and decide to use it, we will — as soon as reasonably practicable, and unless a legal exception applies — take reasonable steps to make that person aware of: the fact and purpose of the collection, that Private Buyers collected and holds the information, the intended recipients, that providing further information is voluntary, the consequences of core details being missing, and their access and correction rights.

In practice this means a referred owner hears from us *before* any investor sees their information. If a referred owner asks us not to make contact again, we close or restrict the enquiry and keep only the minimal record needed to honour that request and meet legal obligations.

8. Who may receive information, and why

Property information is used first for private internal review. It is never placed on a public listing platform. Disclosure is limited to:

- **Authorised Private Buyers personnel** — the small number of people authorised to triage, review, respond to, and manage enquiries, each bound by our internal confidentiality and access rules.
- **Approved investors or purchasers** — only where the property appears suitable and the owner's sharing permission is recorded. Investor recipients receive review material under our Investor Review Confidentiality Standard and must not re-circulate it.
- **Service providers** — the hosting, form, email, storage, security, and document-generation providers described in section 9, strictly to operate the service.
- **Professional and transaction participants** — lawyers, conveyancers, lenders, insurers, accountants, building inspectors, or valuers, where needed for a lawful sale or review step in which you are participating.
- **Authorities** — regulators, courts, or law enforcement where disclosure is required or permitted by law, or is necessary to prevent or lessen a serious threat to safety.

Any disclosure outside these categories will only occur with your authorisation, where New Zealand law requires it, or where New Zealand law otherwise permits it.

9. Where information is stored, New Zealand and overseas providers, and website tracking

Information is stored in our website form systems, email systems, secure databases and file storage, and operational records. Some of our technology providers store or process information on infrastructure outside New Zealand, including:

- **Website hosting, form handling, and security** — content-delivery, edge-hosting, and security infrastructure (currently Cloudflare and related service providers) that may route, process, or store limited technical data outside New Zealand.
- **Email and correspondence** — business email and transactional email delivery providers with global infrastructure.
- **File and database storage** — cloud storage used for enquiry records, photos, and documents.

Before disclosing personal information to a provider outside New Zealand, we satisfy ourselves, on reasonable grounds, that the information will be subject to safeguards comparable to the Privacy Act 2020 — for example through the provider's binding contractual terms, data-processing commitments, published security controls, or another Privacy Act pathway. Where comparable safeguards cannot be confirmed, we either do not use that provider for personal information or obtain express authorisation first.

Cookies, analytics, and tracking

- We do not use third-party advertising cookies, tracking pixels, or cross-site profiling on privatebuyers.co.nz.
- Campaign attribution uses link parameters (QR, flyer, and UTM codes) captured with your form submission — not cookies.
- The invite-only portal stores a login token in the browser's local storage for approved users only; it is not used to track browsing.
- Our hosting provider generates standard server and security logs (IP address, request time, user agent) used solely for security, abuse prevention, and reliability.

10. How we protect information

- All website traffic is encrypted in transit (HTTPS/TLS); administrative access is restricted to authorised personnel and protected by strong credentials and multi-factor authentication where the provider supports it.
- Access follows least privilege: owner-supplied photos and documents are available only to people who need them for review, follow-up, permitted investor review, or transaction work.
- Investor-facing material is prepared as a controlled review file rather than granting investors access to raw enquiry records.
- Reply identities are controlled: property correspondence is sent from verified Private Buyers sender addresses, not personal forwarding addresses.
- Security logs, source tracking, and operator review provide an audit trail of how an enquiry has been handled.

11. How long we keep information

We keep personal information no longer than it is required for the purposes it was collected for, then delete or de-identify it. Our indicative retention schedule:

RECORD TYPE	RETENTION PERIOD	THEN
General questions (no property submitted)	Up to 12 months after the conversation ends	Deleted
Property enquiries that do not progress (no-fit, withdrawn, or incomplete)	Up to 24 months from last contact, so we can honour stop-contact requests, avoid duplicate approaches, and answer any follow-up	Deleted or de-identified
Enquiries progressed to investor review	Duration of the discussion plus up to 24 months	Deleted or de-identified
Records connected to a completed transaction	7 years, consistent with New Zealand tax and business record-keeping requirements	Deleted or archived under legal advice
Stop-contact / do-not-approach records	Kept as a minimal suppression record for as long as needed to honour the request	Retained (minimal record only)
Server and security logs	Up to 12 months	Deleted on provider rotation
Campaign analytics	Retained only in de-identified or aggregated form	No personal information retained

Where a legal hold, dispute, insurance matter, or regulatory obligation requires longer retention of a specific record, that record is kept only as long as that obligation lasts and only for that purpose.

12. Accuracy

Before using or disclosing personal information — and in particular before any property information is put in front of an investor — we take reasonable steps to check it is accurate, up to date, complete, relevant, and not misleading. In practice this is why we ask owners for current photos, honest condition notes, and confirmation of authority and agency status, and why we may come back with specific questions before progressing an enquiry.

13. What happens if information is missing

Providing information is voluntary. However, we cannot review a property or respond meaningfully without core details: contact information, property address or area, price expectation, honest condition notes, confirmation of authority to send the information, and the privacy confirmation. Photos are not mandatory at the first step, but enquiries without photos may be deprioritised or may receive a photo request before any serious review, because most of our buyers are not local and need visual evidence.

14. Your rights: access, correction, withdrawal, and stop contact

You have the right to ask for confirmation that we hold personal information about you, to access it, and to request correction of it. You can also withdraw permission for further investor sharing, ask us to delete information we no longer need, or ask us to stop contacting you. To make any of these requests, email **privacy@privatebuyers.co.nz** or **enquiry@privatebuyers.co.nz** with "Privacy request" in the subject line, or use our Access, Correction and Withdrawal form available in the documents section of the website.

- **Timeframe.** We will respond as soon as practicable and no later than 20 working days after receiving your request, as the Privacy Act requires. If a permitted extension is ever needed, we will tell you within that period, with reasons and your right to complain.
- **No charge.** We do not charge for access or correction requests.
- **Verification.** We may need to verify your identity before releasing information, so records are not disclosed to the wrong person.
- **Correction.** If we do not agree a correction is needed, you may ask us to attach a statement of correction to the record, and we will do so.
- **Withdrawal.** If you withdraw sharing permission, we stop further investor circulation from that point and tell any investor who already holds a live review file to stand the property down. Limited records may still be kept where section 11 requires it.

15. Complaints

If you believe we have interfered with your privacy or mishandled a request, please contact the Privacy Officer first. We acknowledge complaints within 5 working days, investigate, and give you a substantive response within 20 working days. Our Complaints and Correction Process document on the website sets out each step.

You may also complain directly to the Office of the Privacy Commissioner at any time: **privacy.org.nz** | 0800 803 909 | PO Box 10094, The Terrace, Wellington 6143.

16. Privacy breach response

If we become aware of a privacy breach, we act immediately to contain it, assess it, and reduce harm. We assess seriousness promptly — our internal target is within 72 hours of becoming aware — considering the sensitivity of the information, who may have received it, and what harm could result.

If a breach has caused, or is likely to cause, serious harm to anyone, we will notify the Office of the Privacy Commissioner as soon as practicable (using the Commissioner's NotifyUs service) and notify affected people directly wherever practicable, telling them what happened, what information was involved, what we have done, and what they can do to protect themselves. Every breach, notifiable or not, is recorded with the corrective action taken.

Examples we treat as urgent: unauthorised access to owner contact details, property material sent to the wrong recipient, loss of admin credentials, or any disclosure that could create practical harm for an owner, tenant, referrer, or transaction participant.

17. Electronic messages and direct marketing

Replies to your enquiry are service messages, not marketing. If we ever send commercial electronic messages, they will comply with the Unsolicited Electronic Messages Act 2007: sent only with consent, clearly identifying Private Buyers as the sender with accurate contact details, and carrying a functional unsubscribe that we honour within 5 working days. A stop-contact request made in any channel is applied across all channels.

Automated acknowledgements identify Private Buyers, state the response timeframe, and never contain an offer, valuation, or promise that a buyer will proceed.

18. Automated tools and AI assistance

We use software tools, templates, calculations, and AI-assisted drafting to organise enquiries, prepare internal notes, summarise property information, and draft documents. These tools support human review — no decision to decline, progress, or price a property is made solely by an automated system. A person reviews owner-facing material before it is sent, particularly anything discussing price, condition, legal position, or next steps. Personal information is not used to train third-party AI models.

19. Children, unique identifiers, and scope notes

- Our service concerns property transactions and is not directed at children. We do not knowingly collect personal information from anyone under 18; if we learn we have, we delete it.
- Internal enquiry reference numbers identify enquiries, not people, and are not used as personal identifiers outside our enquiry handling systems.
- We do not operate CCTV and do not record phone calls.
- This policy covers privatebuyers.co.nz and our enquiry-handling systems. External sites we link to (for example, the Office of the Privacy Commissioner) have their own policies.

20. Changes to this policy

We review this policy at least annually, and earlier if our providers, investor processes, campaign channels, or the law change. Material changes are published on privatebuyers.co.nz with a new version number and date, and the version history is retained. Information collected under an earlier version continues to be handled no less protectively than that version promised.

21. Contact

Privacy Officer: The Privacy Officer, Private Buyers

Email: privacy@privatebuyers.co.nz or enquiry@privatebuyers.co.nz (subject line "Privacy request")

Website: https://privatebuyers.co.nz/privacy

Regulator: Office of the Privacy Commissioner — privacy.org.nz | 0800 803 909

Approval

Private Buyers — Privacy Officer

Approved for publication by the designated Privacy Officer. This is a typed approval record; a handwritten signature is not required for the policy to be effective.

Version control

Policy version: 2026-07-02 v9

Approved: 2 July 2026

Replaces: 2026-07-02 v8

Next review: By 2 July 2027, or earlier before broad paid marketing, formal investor onboarding, or material platform expansion.

Prepared for Private Buyers. This policy is general information for people dealing with Private Buyers; it is not legal advice to readers. Version history is retained in the Private Buyers document control register.