

# Privacy Compliance Statement: Biometric Information Use

## 1. Purpose and Lawful Basis

This statement confirms that Tompkins Wake ("Tompkins Wake", "we", "our") complies with the Biometric Processing Privacy Code 2025 issued under the Privacy Act 2020. The Code regulates how organisations collect, hold, and use biometric information for the purposes of biometric processing.

We collect biometric information (e.g., facial recognition) for the purpose of verifying customer identity under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 ("AML/CFT Act") obligations. This processing is lawful under the Privacy Act 2020 and the AML/CFT Act.

[You can view our Biometric Processing Privacy Code 2025 – Information Sheet here.](#)

## 2. Necessity and Proportionality

Biometric processing is necessary and proportionate to achieve secure and efficient identity verification.

## 3. Transparency and Notification

Individuals are informed about biometric information collection through our Privacy Notice and onboarding process. They are advised of:

- What biometric information is collected
- Why it is collected
- How it is used
- What alternatives (if any) are available
- Who will receive the biometric information
- How long it will be retained
- Their rights to access, correction, and complaint

We contract RealAML to undertake biometric processing for us. The RealAML Biometric Privacy Compliance Statement is available [NZ Biometric Privacy Compliance Statement].

## 4. Safeguards and Security

We implement the following safeguards:

- Encrypted collection of biometric templates

- Role-based access controls and audits
- RealAML only process biometric information outside New Zealand where the destination country provides comparable privacy safeguards or there are contractual protections that meet Rule 12 of the Code
- Data retention limited to at least five years after the completion of the transaction or at the end of the business relationship with the customer, followed by secure disposal, as per the requirements of the AML/CFT Act.

## 5. Cultural Considerations

We have considered potential cultural impacts, particularly Māori perspectives, to ensure respectful and culturally safe practices.

## 6. Individual Rights

Under the Code and the Privacy Act, individuals can:

- Confirm whether we hold their biometric information
- Request access to that information and request correction or deletion
- Attach a statement of correction if we do not agree to amend
- Withdraw consent where applicable (subject to legal/regulatory requirements).

Requests can be made via [aml@tompkinswake.co.nz](mailto:aml@tompkinswake.co.nz)

## 7. Review and Accountability

This statement is reviewed annually. The Privacy Officer is responsible for ensuring ongoing compliance.



You can contact our Privacy Officer at [privacyofficer@tompkinswake.co.nz](mailto:privacyofficer@tompkinswake.co.nz) or otherwise contact the New Zealand [Privacy Commissioner](#).