

## Personal Data Privacy Statement

### General Data Protection Regulation

The General Data Protection Regulation (GDPR) was introduced on 25 May 2018 and was designed to harmonise data protection for individuals within the European Union, including the UK. Together with the Data Protection Act 2018, it replaces the Data Protection Act 1998. Its main objective is to protect your personal information as well as to clarify the regulatory environment for business.

The Trustee of the ANZ UK Staff Pension Scheme (the Scheme) holds certain personal information about you, our Scheme members and, where we need to, your dependants and beneficiaries. The Trustee is the data controller who decides why and how the data is used. Personal information is data that uniquely identifies you.

The Trustee is committed to protecting your privacy and the confidentiality of your personal information and is providing this notice to help you understand how we collect and use your data.

### How we collect your information

We may collect your personal information in a number of ways as follows:

- from the information that you provide to us on joining the Scheme or during your membership
- from ANZ, for example, payroll information such as salary information and contribution/National Insurance deductions
- from other sources if relevant, including other pension schemes and pension providers, medical practitioners, payroll providers and other advisers with whom the Trustee communicates in relation to the administration of the Scheme, and HMRC.

### Information we hold about you

This will include information we have collected in the past as well as new information we obtain. We may collect and hold the following types of personal information:

- your name and postal address
- email address(es)
- telephone number(s)
- date of birth
- gender
- marital status
- National Insurance number
- employee/payroll number
- ANZ and Scheme service dates
- financial information including salary information relevant to your benefits in the Scheme
- bank account details
- details about your pension benefits
- membership of ANZ's private medical scheme where eligible
- membership of the ANZ Pensioners' Association where consent has been given
- details of your dependants/beneficiaries
- your tax status/code
- certificates such as birth, marriage, divorce
- documents such as passport, Court Orders relating to pension benefits
- copies of benefit calculations
- records of communications and interactions between us.

We may also hold information relating to your health which is a special category of data, namely 'sensitive personal information'.

## How we use this personal information

The Trustee and its service providers will process your personal information and the personal information of your beneficiaries and dependants for the purposes disclosed in the table below.

Processing purpose	Legal basis for processing
To administer ANZ's pension arrangements	The Trustee has a legitimate interest in being able to administer ANZ's pension arrangements and to liaise with its service providers to do so.
To provide actuarial services for the Trustee	The Trustee has a legitimate interest in instructing actuarial service providers to provide actuarial services for the effective management of the Scheme.
For the Trustee to manage its pension arrangements	The Trustee has a legitimate interest in managing its pension arrangements.
To pay members, pensioners or dependants lump sum or pension benefits	The Trustee has a legitimate interest in being able to pay members, pensioners and dependants lump sum or pension benefits.
To provide death in-service (DIS) cover to members	The Trustee has a legitimate interest in being able to provide death in-service (DIS) cover to in-service members.
To prepare and issue bulk communication exercises to members	The Trustee has a legitimate interest in communicating and interacting with the membership.
To provide a facility for in-service members to make additional voluntary contributions where appropriate	The Trustee has a legitimate interest in providing a facility for in-service members to make additional voluntary contributions where appropriate.
To obtain Trustee liability insurance and protection against fraudulent crimes	The Trustee has a legitimate interest in obtaining Trustee liability insurance and to protect against fraudulent crimes.
For all legal matters associated with running the Scheme	The Trustee has a legitimate interest in establishing, exercising and defending its legal rights.
To comply with legal requirements	The Trustee has a legitimate interest in making sure it complies with legal requirements.
To comply with audit requirements	The Trustee has a legitimate interest in instructing auditors to provide professional services to meet its statutory audit obligations.
To manage annuities with third parties	The Trustee has a legitimate interest in managing annuities with third parties.
To verify member data	The Trustee has a legitimate interest in verifying members' data in order to highlight any inaccuracies and to confirm that members are eligible to receive benefits under the Scheme.
For system calculation instruction changes/maintenance	The Trustee has a legitimate interest in system calculation instruction changes/maintenance in order to identify existing issues and to plan improvements.

The Trustee may also process sensitive personal information for the purpose of paying particular benefits such as ill-health pensions or contingent death benefits. Where the Trustee is required to process sensitive personal information, the Trustee will approach you or the relevant individuals for explicit consent to the processing of such data.

The Trustee also holds and processes this information to comply with its obligations under the Trust Deed and Rules of the Scheme and government legislation. Your personal data is held on paper and on computer systems.

## Who we share your personal information with

The Trustee uses your data for contractual and legal reasons (see opposite) as well as where you have given your consent.

For these purposes, the Trustee uses various entities and your information may be disclosed for processing to:

- ANZ's pension administration team and ANZ (e.g. the Talent & Culture (formally Human Resources)/ payroll departments)
- the Scheme's professional advisers, including the Scheme actuary, auditor, medical advisers, investment adviser, lawyers and other third parties who assist with the day-to-day administration of the Scheme, such as tracing agencies and the payroll provider
- the advisers and printers who help us prepare various communications we send to you such as benefit statements or pension increase statements
- insurance companies for the purposes of life insurance, paying annuities and investing additional voluntary contributions
- banks and other payment systems
- regulators and Government bodies (including HMRC and the Pensions Regulator) and other authorities where legally obliged to do so
- other third parties where relevant or required, for example in the event that the Trustee wishes to enter a buy-in/buy-out of any of the benefits under the Scheme, in which case it may disclose your personal data to the prospective counterparty to such a transaction
- to a prospective purchaser of an ANZ Group entity
- third party outsourced IT and documents storage providers where we have an appropriate data processing agreement in place.

Some of these entities may transfer, store or process data in other countries including countries outside the EEA. In these circumstances, your personal information will only be transferred where adequate safeguards are in place. This means that either the entities have standard contractual clauses (called Model Contract Clauses) or that the European Commission has decided that the country or territory to which the transfer is made has an adequate level of protection.

The Scheme actuary and Scheme auditor also act as data controllers in respect of members' data. There are separate privacy statements available at [www.willistowerswatson.com/personal-data](http://www.willistowerswatson.com/personal-data) and [www.pwc.co.uk/who-we-are/privacy-statement.html](http://www.pwc.co.uk/who-we-are/privacy-statement.html) or on request to the Pensions Team which covers their obligations under the GDPR requirements.

## Automated decision-making

We do not envisage that decisions will be taken about you using automated means. In the event that this position changes, we will notify you in writing.

## How long we keep your personal information

We must keep all personal information safe and only hold it as long as is necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

The Trustee has in place a retention policy reflecting the long-term nature of pension schemes. Within this, the Trustee expects it to be necessary to keep most personal information for the duration of the Scheme, although data for death cases will be deleted/destroyed after seven years where there is no further liability to make benefit payments.

## Your rights to your personal information

Part of our role in keeping your information safe is to let you know about your rights in relation to your personal information. You can write to us at any time to obtain a copy of your information and to have any inaccuracies corrected. Under certain circumstances, by law you have the right to access your personal information; have your personal information erased, rectified, transferred, amended or completed; object to or restrict the processing of your personal data; and where you have given your consent to us processing your data, you can withdraw that consent. Where consent is withdrawn, this will not affect the lawfulness of any processing of personal data based on consent before its withdrawal.

Please also note that the Trustee can take steps to override a member's request to object to processing, to withdraw consent or to delete personal data, if this will impact the payment of your benefits. You will not normally have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly excessive.

Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights in relation to your information, please submit your request by emailing [gdpereurope@anz.com](mailto:gdpereurope@anz.com) or calling +44 (0) 203 229 2595, and you will be sent a Subject Access Form to complete and return. If you would like more information on the content of this statement, please submit a written application to the Pensions Team, ANZ UK Staff Pension Scheme, 40 Bank Street, Canary Wharf, London E14 5EJ.

Where you are dissatisfied with any aspect of the Trustee's handling of your personal information, you have a right to lodge a complaint with the Information Commissioner's Office.

Their contact details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 or 01625 545 745

Fax: 01625 524 510

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## Updates to this statement

We reserve the right to update this privacy statement at any time. If we change this Statement, we will issue an updated version as soon as reasonably practical thereafter. This Statement was first issued in May 2018.