ABOUT THIS POLICY
Mercer (N.Z.) Limited and Mercer Investments (New Zealand) Limited, referred to collectively in this Policy as Mercer, are committed to:

• promoting and protecting the privacy of individuals we interact with;
• collecting, managing and using personal information responsibly and lawfully;
• providing individuals with appropriate access to their personal information held with us; and
• resolving privacy complaints appropriately.

Mercer is bound by and adheres to the New Zealand Privacy Act 2020 (the Act) and the Privacy Principles as set out in the Act. These govern how we collect, use, hold and disclose your personal information. This Policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see www.privacy.org.nz

WHAT IS PERSONAL INFORMATION?
In this Policy, the term ‘personal information’ means information about an identifiable individual and generally refers to information that identifies a person and which is not otherwise available from public sources.

Personal information includes information collected directly or indirectly from customers.

WHY DO WE COLLECT PERSONAL INFORMATION?
Mercer only collects personal information necessary to provide its products and services; to meet regulatory and related requirements; for employment-related purposes; or to otherwise conduct its business which may also include:

• processing and responding to your web enquiry;
• administration, marketing, operation, security and management of the Mercer funds, products and services;
• the provision of our financial products and services to you;
• to understand our users preferences and interests;
• for internal research, development, and optimisation of our platforms and the services we provide; and
• targeting our advertising, and letting you know about new features and services we offer.

HOW DO WE COLLECT PERSONAL INFORMATION?
We collect most personal information directly from you. Sometimes we may (and you authorise us to) collect personal information about you from other people, such as your authorised financial adviser, employer, if you are a minor represented by a legal guardian or if you have a power of attorney in place.
WHO DO WE DISCLOSE PERSONAL INFORMATION TO?

Mercer outsources some of its activities and may disclose personal information to local and overseas outsource service providers, its network of financial advisors, third party suppliers and other external parties in order to provide its products and services; to meet regulatory and related requirements; for employment-related purposes; or to otherwise conduct its business.

Third parties also include Mercer’s ultimate parent company, Marsh McLennan, a public company listed on the New York, London and Chicago Stock Exchanges. Mercer takes reasonable steps to ensure that any overseas recipients of personal information are subject to privacy laws that provide comparable safeguards to those in the Act.

Before performing any services for Mercer or being given access to Mercer systems, third party service providers’ information security controls are assessed by Mercer to ensure compliance with the Act.

Contracts with third parties include security and privacy terms and conditions commensurate with the types of services provided.

DIRECT MARKETING

Mercer may use our customers’ personal information for direct marketing communications and to provide information about our products and services or those offered by an associated entity, which could be of interest to customers.

Customers can opt-out of receiving marketing communications by using the opt-out facilities within the marketing communications.

We, and our third party service providers may use cookies, web beacons and other storage technologies when you visit our websites.

HOW DO WE HOLD PERSONAL INFORMATION?

The personal information we hold will be stored securely by us or our service providers, whether electronically or otherwise. We use a range of security measures to protect the personal information we hold.

WHAT DO WE DO IF THERE’S BEEN A BREACH OF YOUR PERSONAL INFORMATION?

Where Mercer becomes aware of an actual access or disclosure of a customer’s personal information, we will ensure that the potential breach is managed by Mercer in accordance with the Notifiable Privacy Breach provisions in the Act. This may include notifying both our customer and the Privacy Commissioner where that breach is likely to result in or potentially cause serious harm as defined in the Act.

Mercer has a well-defined incident management process. The Statement of Incident Management is available on request.

HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?

Mercer aims to ensure that the personal information we hold about individuals is accurate, up-to-date and complete.

You have rights under the Act and Privacy Principles to find out what personal information we hold about you, get a copy of and request correction to the personal information you have supplied, by contacting Mercer on the contact details below. Any update to your personal information may be used to update other information held about you by any member of the Mercer Group.

Mercer does not use government identifiers such as Inland Revenue numbers as individual identifiers. Mercer does not use or disclose government related identifiers in any way that is inconsistent with the purpose for which they were originally issued other than where it is required or authorised by or under a New Zealand law or a court/tribunal order.

WHAT HAPPENS IF YOU DO NOT PROVIDE PERSONAL INFORMATION?

Mercer recognises that Anonymity can be an important element of privacy. However, if you do not provide the personal information we request, we may not be able to respond to your enquiry or provide you with the full range of products and services we offer.
Legislative requirements such as the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 may require Mercer to undertake customer due diligence (CDD) at certain stages of a customer or employment relationship. Such regulatory requirements mean Mercer must collect certain personal information before it can perform certain actions or enter certain relationships.

CONTACT US

If you have any questions about this Privacy Policy or if you have any concerns or would like to make a complaint regarding the treatment of your personal information, you can contact Mercer’s Privacy Officer.

We treat any concerns or complaints that you may have with respect and confidentiality. A Privacy representative will contact you within two business days after receipt of your concern or complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved within a timely and appropriate manner.

You can contact Mercer’s Privacy Officer as follows:

The Privacy Officer
Mercer (N.Z.) Limited
PO Box 105 591
Auckland 1143
nz.privacy@mercer.com

If your concerns are not resolved to your satisfaction you can contact the Privacy Commissioner as below:

The Privacy Commissioner
0800 803 909
www.privacy.org.nz
enquiries@privacy.org.nz

POLICY REVIEW

This policy will be reviewed from time to time at Mercer’s discretion. Check Mercer New Zealand’s website for updates.