

MERCER NEW ZEALAND PRIVACY POLICY



ABOUT THIS POLICY

Mercer (N.Z.) Limited and Mercer Investments (New Zealand) Limited, referred to collectively in this Policy as Mercer NZ, are committed to ensuring the privacy of our customers' personal information.

In this Policy, 'customers' means customers and employees of Mercer NZ.

Mercer NZ adheres to the Information Privacy Principles which support the *Privacy Act 1993*.

The Principles are designed to ensure that organisations handle personal information responsibly.

Mercer NZ complies with the requirements of the Act in respect of the collection, use and disclosure of personal information. This Policy is intended to provide an understanding of how Mercer NZ manages the personal information it collects.

WHAT IS PERSONAL INFORMATION?

In this Policy, the term 'personal information' has the meaning given to it by the Act and generally means information that identifies a customer and which is not otherwise available from public sources.

This includes information collected directly or indirectly from customers or third parties, including advisers, auditors, current and past employers, insurers, recruitment agents, credit bureaux, KiwiSaver or superannuation funds and Government agencies.

COLLECTION OF PERSONAL INFORMATION

Personal information collected by Mercer NZ may include the following, as appropriate to the purpose for which it is collected, but is not limited to:

- full name
- address
- date of birth
- contact details (including phone and email)
- gender
- relationship status
- occupation
- length of service
- IR number
- tax rate
- salary
- financial information
- financial and personal status including credit history, bankruptcy, convictions
- employment references
- information connected with employment related matters
- health, medical or lifestyle information relevant to an insurance product
- information required to comply with regulatory or related purposes, including the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act) and
- additional information relating to a customer provided directly or indirectly through the use of our websites or online presence such as 'cookies'.

PERSONAL INFORMATION USE AND DISCLOSURE

Mercer NZ collects personal information which is reasonably necessary to provide its products and services; to meet regulatory requirements; and for employment-related purposes.

As far as practicable, Mercer NZ collects personal information directly from the customer.

In accordance with the Act, Mercer NZ will only collect, use and disclose personal information required to provide its products and services; comply with regulatory and related requirements; or to manage employment relationships. This includes to:

- manage and administer superannuation, flexible savings schemes and KiwiSaver scheme interests
- provide investment services
- provide financial advice services and/or to implement customer instructions
- provide consulting or other services
- handle enquiries, complaints or disputes;
- assess, investigate and decide insurance entitlements and claims
- file regulatory reports and returns
- respond to requests from Government agencies
- enable trustees to perform their lawful functions
- fulfil AML/CFT reporting obligations to NZ Police
- comply with regulatory demands
- enable data hosting and IT services, which may include to service providers located outside New Zealand and
- facilitate recruitment, engagement and ongoing employment

In the event customers do not provide the requisite information, Mercer NZ may not be able to provide or continue to provide its products and services or commence/maintain employment relationships.

Information collected from customers may be also be shared or aggregated with information from other entities associated with Mercer NZ.

Mercer NZ may also use the information to sell other products and services offered by Mercer NZ or its associated entities.

Mercer NZ is not permitted to and does not use government identifiers, such as IR numbers, as individual identifiers. Mercer NZ 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.

SECURITY

Mercer NZ places a high priority on the security of personal information and is committed to protecting customers' personal information. Mercer NZ takes all reasonably practicable steps to ensure that personal information is secure and that appropriate safeguards are maintained to prevent misuse or loss through unauthorised access, modification or disclosure.

Mercer NZ uses technical, administrative and physical safeguards to protect the confidentiality and integrity of the personal information it collects.

As far as reasonably practicable, Mercer NZ destroys personal information it holds when it is no longer required. However, in some situations, personal information may be retained in order to comply with tax, legal or regulatory requirements, or otherwise as required by government agencies.

PRIVACY ON THE INTERNET

Mercer NZ takes care to ensure that personal information provided via Mercer NZ websites is protected through appropriate safeguards to prevent unauthorised use of or access to personal information. Mercer NZ implements administrative, physical and technical safeguards to protect the confidentiality and integrity of personal information exchanged via websites.

Mercer NZ uses 'cookies' to store information provided by customers' browsers when they visit a website. This includes date and time of visit, pages accessed and downloaded documents. Such data enables Mercer NZ to keep track of the volume and type of products or services viewed and, unless customers opt out, to send information and updates about those products or services. Cookies are also used to measure demographic usage patterns to improve Mercer NZ products and services.

Mercer NZ websites may contain links to non-Mercer NZ sites e.g. the Retirement Commissioner, and Mercer NZ makes no representations or warranties in relation to their privacy practices. Mercer NZ is not responsible for the privacy policies or content of non-Mercer NZ websites.

Information transmitted via Mercer websites requires customers to take measures to protect their own privacy, including ensuring passwords, PINs and codes are kept secure and notifying Mercer NZ immediately in the event they are lost or compromised.

ANONYMITY

Mercer NZ recognises that anonymity can be an important element of privacy and that some website users may wish not to identify themselves, particularly when using Mercer on-line tools or functionalities.

However, legislative requirements such as the AML/CFT Act and certain Mercer policies e.g. employment screening, require Mercer NZ to undertake customer due diligence (CDD), at a certain stage in the customer relationship. CDD means getting to know the customer and normally entails the provision of personal information.

In any case, it is generally impracticable for Mercer NZ to deal with customers who cannot or will not provide appropriate personal, product or service related information.

In certain circumstances, withholding personal information may result in the customer being denied access to or the benefit of Mercer NZ's product and services e.g. the non-provision of health information preclude or limit the availability of insurance benefits or employment opportunities.

ACCESS AND CORRECTION

Mercer NZ intends that customers' personal information is accurate, up-to-date and complete, as far as practicable.

Customers can access their personal information by contacting Mercer NZ's Privacy Officer.

In certain situations, Mercer NZ can decline a customer's request for their personal information e.g. where required by law; where it would have an unreasonable impact on the privacy of others; the information relates to existing or anticipated legal proceedings; or there is a suspicion that unlawful activity or serious misconduct may have occurred.

Where a customer advises that personal information held about them is not accurate, up-to-date or complete, Mercer NZ will correct the information, subject to verifying the customer and the corrected information.

Where Mercer NZ is the manager or administrator of a customer's superannuation fund, flexible savings scheme or KiwiSaver scheme, personal information can be updated by accessing the relevant website, contacting the appropriate Fund Administrator or via the Helpline.

CROSS-BORDER AND THIRD PARTY DISCLOSURE

Mercer outsources some of its activities and may disclose personal information to local and overseas outsource service providers and third party suppliers in order to provide its products and services; comply with regulatory and related requirements; or to manage employment relationships.

The countries where these parties are domiciled include but are not limited to:

- United Kingdom
- United States
- India
- New Zealand
- Bermuda
- Singapore

Third parties also include Mercer's ultimate parent company, Marsh & McLennan Companies, a public company listed on the New York, London and Chicago Stock Exchanges. Mercer NZ takes reasonable steps to ensure that any overseas recipients of personal information apply comparable privacy standards.

DIRECT MARKETING

Mercer NZ may use customers' personal information for direct marketing communications and to provide information about Mercer NZ's 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.

Marketing communications can take various forms including mail, fax and electronic media such as email, SMS and social media such as Twitter and Facebook.

Customers who have indicated a preference for communications method will have that method used, whenever practical to do so.

Mercer does not share, sell, rent or disclose your personal information to other organisations other than in accordance with this Policy.

PRIVACY COMPLAINTS

Mercer NZ treats complaints with respect and confidentiality.

Informal complaints can be made at any stage in the customer's relationship with Mercer NZ and immediate efforts will be made to address the matter. If the matter is not resolved to the customer's satisfaction, it can be escalated to the Privacy Officer.

Formal complaints should be in writing and contain sufficient detail to enable the Privacy Officer to gain a full understanding of the issue and its history.

A privacy representative will contact the customer within a reasonable time after receipt of their complaint, with the aim of resolving the complaint in a timely and appropriate manner.

Complaints which are not resolved to customer's satisfaction can be made to the Privacy Commissioner as below:

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

CONTACT US

Any questions, queries or complaints can be made by contacting Mercer NZ's Privacy Officer, as follows:

The Privacy Officer
Mercer (N.Z.) Limited
P O Box 105-591
Auckland 1143
NZ.Privacy@mercer.com

CHANGES TO THE PRIVACY POLICY

Mercer NZ reserves the right to change this Policy at its discretion, from time-to-time. Changes may take the form of a new policy.

Check Mercer NZ's website for updates or changes.