

# Personal Data Privacy Statement

### UK General Data Protection Regulation

The main objective of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 is to protect your personal information as well as to clarify the regulatory environment for business.

ANZ Pensions (UK) Limited, as 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 personal 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
- dependants/beneficiaries' details
- your tax status/code
- certificates such as birth, marriage, divorce
- documents such as passport or 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 personal data.

## How we use your personal information

The Trustee will process your personal information and the personal information of your beneficiaries and dependants for the purposes disclosed in the table below. Depending on the circumstances, the Trustee may process all of the personal information it collects for these purposes.

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 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 processing is necessary for compliance with a legal obligation to which the Trustee is subject. The Trustee also has a legitimate interest in making sure it attends to all legal matters associated with running the Scheme
To comply with legal requirements	The Trustee has a legal obligation to comply with statutory and regulatory requirements applicable to it and the Scheme
To comply with audit requirements	The Trustee has a legal obligation to comply with its statutory audit requirements. The Trustee also has a legitimate interest in instructing auditors to provide professional services relating to the Scheme
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 changes/maintenance in order to identify existing issues and to plan improvements

The Trustee may also process special category personal data for the purpose of paying particular benefits such as ill-health pensions or contingent death benefits. Where the Trustee is required to process special category personal data, the Trustee might 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 information is held on paper and on computer systems.

## Who we share your personal information with

The Trustee may disclose your personal information to various entities for the processing purposes described on the previous page, including:

- ANZ, including ANZ's pension administration team, Talent & Culture (formerly Human Resources), and payroll department
- professional advisers, including the Scheme actuary and provider of actuarial services (currently, WTW), auditor (currently PwC), investment adviser, risk transfer adviser and post-transaction support services (currently, Hymans), lawyers (currently, Mayer Brown) and other advisers
- communication consultants (currently, Wordshop) and printers (currently, Acanthus Press), who help us prepare various communications we send to you such as benefit statements or pension increase statements
- software providers (currently, ITM) and providers of cloud, data centre, network and other outsourced IT solutions
- other third parties who assist with the day-to-day administration of the Scheme, such as tracing agencies (currently, ITM), payroll providers (currently, Aptia, following the sale and transition presently in progress of pensioner payroll services from Mercer) and storage providers (currently, Restore)
- insurance companies for the purposes of paying annuities and investing additional voluntary contributions (currently, Scottish Widows, ReAssure, and Legal & General)
- insurance companies for the purpose of a bulk purchase annuity policy (currently, Standard Life and its reinsurer SwissRe)
- regulators and Government bodies (including HMRC and the Pensions Regulator) and other authorities, where legally obliged to do so
- a prospective purchaser of an ANZ Group entity

Some of these entities may transfer, store or process data in other countries including outside the United Kingdom. In these circumstances, your personal information will only be transferred in accordance with applicable legislation. For example, this means that either the receiving entities have entered into standard contractual clauses (called the International Data Transfer Agreement) or that the UK Government has decided that the country or territory to which the transfer is made has an adequate level of protection (such as EU Member States). Where applicable, you may request a copy of the standard contractual clauses or the International Data Transfer Agreement in place with the receiving entity by emailing [gdpereurope@anz.com](mailto:gdpereurope@anz.com).

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

## 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 a retention policy in place, 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.

## 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 have a right to **access** and **obtain a copy** of your personal information. You also have a right to have any inaccuracies **corrected**. These rights always apply.

Under certain circumstances, you have a right to request **deletion** of your personal information, (for example, if there is no reason for its continued storage or processing).

Under certain circumstances, you also have a right to **restrict** the processing of your personal information (for example, if you want us to establish its accuracy), or **object** to the processing (where we rely on a legitimate interest as a legal basis, unless we have a compelling legitimate ground for the processing).

You have a right to request **transfer** of personal data which you have given us to another party where we rely on your consent to process your personal information.

Where you have given us your consent to the processing of your personal information, you can withdraw consent at any time. Once we receive notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally consented to, unless we have another legal basis for doing so in law. Withdrawal of your consent will not affect the lawfulness of any processing of personal information based on your consent before the withdrawal.

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.

## Contact

If you would like more information on the content of this statement, please contact us at:

**Address:** ANZ Pensions Team  
ANZ UK Staff Pension Scheme  
Level 12  
25 North Colonnade  
London E14 5HZ

**Email:** [pensionsadministration@anz.com](mailto:pensionsadministration@anz.com)

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:

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

**Tel:** 0303 123 1113

**Website:** [ico.org.uk](http://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 last updated in October 2024.