



Privacy Policy

BNP Paribas Fund Services Australasia Pty Ltd New Zealand

Issued November 2020

Privacy Policy

This is the Privacy Policy of BNP Paribas Fund Services Australasia Pty Ltd New Zealand Branch (**BNP Paribas New Zealand, we or us**). This Privacy Policy is intended for customers, suppliers, contractors, employees, prospective candidates for employment and any other person who has dealings with BNP Paribas New Zealand. We are bound by the New Zealand Information Privacy principles, upon which this Policy is based.

This Privacy Policy relates to personal information and unless otherwise expressly stated, this policy is relevant to the personal information of: (a) individuals who are employees or officers of our current, prospective or former customers; (b) individuals who are employees or officers of any agent or delegate of such customers; and (c) other individuals we may deal with in our role as a service and product provider, (**you**).

Personal Information

Personal information is defined under the Privacy Act 2020 (NZ) (**Privacy Act**) as information or an opinion about an identified individual.¹

Personal Information Collected From You

We may obtain personal information from you directly or otherwise through our customers or prospective customers or their agents or delegates. The type of information that we collect and hold will depend on what products and services our customers or prospective customers wish to use.² Such information may include your name and address, telephone number(s), email and other electronic addresses, occupation, assets, details about your business dealings, information about your dealings with us, our affiliates or third parties, government identifiers such as your NZBN, passport number, driver's license, utility bills and other details relating to your relationship with us. If you provide incomplete information we may not be able to provide any customer or prospective customer (on whose behalf you are acting) with the products or services being requested.

How We Use Personal Information Collected From You

We collect, hold, use and disclose your personal information as reasonably necessary and as permitted by law. We would generally collect, use and/or disclose your personal information for the following purposes:

- complying with our legislative, audit, regulatory and compliance requirements;
- complying with BNP Paribas Group policies and procedures;
- processing an application or request for products and services (including verifying a customer or prospective customer's identity for legislative/regulatory purposes);

¹ *Personal information* includes information relating to a death that is maintained by the Registrar-General under the *Births, Deaths, Marriages, and Relationships Registration Act 1995* or any former Act (as defined in section 2 of the *Births, Deaths, Marriages, and Relationships Registration Act 1995*)

² *Collect* is defined as 'taking any step to seek or obtain personal information'.

- servicing our customers;
- performing our administrative operations, including accounting, risk assessment, risk management, record keeping , archiving, customer reporting, internal reporting, customer invoicing, systems and infrastructure maintenance and development, business continuity and disaster recovery processes and testing;
- delivering our products and services to our customers, including the processing of customer instructions;
- understanding our customers' and prospective customers' needs and offering products and services to meet those needs;
- allowing our affiliates to promote their products and services to our customers and prospective customers;
- conducting market or customer satisfaction research;
- inviting you to events that may interest you; and
- dealing with complaints.

We may also hold, use and/or disclose your personal information for the purposes of preventing, detecting and protecting BNP Paribas New Zealand from error, fraud and any other legal, compliance, financial or regulatory risks.

To the extent that we sub-contract or delegate functions and activities to other BNP Paribas Group entities (including any branches of BNP Paribas Securities Services or BNP Paribas SA) and to external service providers/vendors, your personal information may be disclosed to such parties. We will prohibit such parties from using your personal information except for the specific purpose(s) for which we supply it.

We may also disclose your personal information to regulatory, government, taxation and other authorities.

Some of these parties to whom we disclose your personal information may be located outside of New Zealand. In such circumstances, we will take all steps reasonably necessary to ensure that the overseas recipient does not breach the New Zealand Information Privacy Principles. We also ensure that appropriate data handling and security arrangements are in place to ensure that information is protected in a way that provides comparable safeguards to those required under the Privacy Act. It is not reasonably practicable to list all of the countries to which your personal information may be transferred from time to time but it is likely that such countries will include Australia, India, Hong Kong, Singapore, the United Kingdom, France and other countries in the European Union.

Except where it is required by law or where otherwise permitted by the Privacy Act, we only use or disclose your personal information with your authorisation. We obtain your consent in various ways. For instance, we may obtain your consent to use or disclose your personal information from your employer or from an agent acting on your behalf, or on an application form that you complete for one of our products or services. If at any time you supply us with personal information about another person, you should ensure that you are authorised to do so and you must agree to inform that person who we are, that we will use and disclose that personal information and that they may gain access to it should we hold that information.

We do not disclose names and addresses to third parties for the purpose of enabling such third parties to directly market their products and services.

If you do not provide us with your personal information when we ask for it, we may not be able to provide you (or any entity on whose behalf you are acting) with our products and services.

How Your Personal Information is Kept Up-to-Date and Requesting Correction of Your Personal Information

We take reasonable steps to ensure that your personal information is accurate whenever we collect it or use it.

If you find that personal information we hold about you is inaccurate, you have rights under the Privacy Act to request that we correct that information. If you would like to do so please contact our Privacy Officer using the contact details below.

How You Can Access Your Personal Information

You are entitled under the Privacy Act to access personal information that we hold about you by contacting our Privacy Officer using the contact details below. If possible, we will provide you with the information you request. However, we may deny access to personal information in certain circumstances, in accordance with the New Zealand Information Privacy Principles.

We will generally provide you with such information within a reasonable time frame. There is no fee for making the initial request. However, we may charge you a reasonable amount to provide a copy of your personal information. If there is an access charge, we will give you an estimate of the fee and confirm with you whether you would like us to proceed.

Storage and Security of Your Personal Information

We protect any personal information that we hold, from misuse and loss and we also protect it from unauthorised access, modification and disclosure. Your personal information may be stored in hard copy documents, as electronic data or in our information technology software and/or systems. We may hold your personal information for a period of time based on the purpose for which it was collected, or as otherwise required by the law.³

Complaints Procedures

If you have a complaint that relates to the privacy of your personal information or you believe that the New Zealand Information Privacy Principles have been breached by us with respect to your personal information, then please contact the Privacy Officer using the contact details below. We will respond to your complaint as soon as possible, in any event within five working days, to let you know who is dealing with your complaint. We will endeavour to ensure that

³ As per Information privacy principle 9 clause 22, *Privacy Act 2020*

the complaint is properly considered and dealt with within 45 working days of receipt thereof. In the event that your complaint is not properly dealt with, you are entitled to take the complaint to the Office of the Privacy Commissioner.

The Privacy Act entitles you to make a complaint directly to the Office of the Privacy Commissioner, should you feel that there has been interference with your privacy.⁴

Privacy Officer Contact Details

Mail: Attn: Privacy Officer (Compliance Manager NZ)
BNP Paribas Fund Services Australasia Pty Ltd, New Zealand Branch
Level 18 , Aon Centre, 1 Willis St
Wellington
New Zealand

Phone: +64 (4) 439 2134

Email: AU.Compliance@au.bnpparibas.com

Branch BNP Paribas Fund Services Australasia
Pty Ltd Issued October 2020

⁴ s70 of the Privacy Act 2020