

FireSuper privacy policy

Date last updated: 06 June 2024

This privacy policy explains how your personal information is collected, used and disclosed by or on behalf of FireSuper Trustee Limited (the '**trustee**'), which manages FireSuper ('the **scheme**') as its trustee under the FireSuper [trust deed](#).

It covers all information collected, used and disclosed by the scheme, including through the administration manager of FireSuper (Mercer (N.Z.) Limited), other third parties, the scheme's website (www.firesuper.org.nz), our services and in any other interactions with you.

We may also collect, use and disclose information to the extent that applicable law does not prohibit it.

References in this privacy policy to 'we', 'our', or 'us' should be read as the trustee and/or the administration manager of FireSuper, as the context requires.

1 Information we collect

Information we collect may include personal information about you, for example, name, email, contact address, financial information. The personal information we collect may include information:

- you communicate with us via post, email or telephone (including to the helpline)
- provided by your employer
- you provide us through completing one of our forms, such as the membership application form for the scheme
- you provide us when registering an online account on our website, submitting an online form, requesting information, filling out a survey or application through our website or otherwise submitting information to us through our website
- you give us when you use certain parts of our website (such as managing your online account and investments) or otherwise relating to your interactions and transactions on or through our website (including via your online account)
- you provide us through any other method (including in-person or virtual meetings, correspondence and discussions)
- we collect through tracking your use of our website, including the content you access and any services you utilise, and information collected through automated technologies as further detailed below.

2 Automatic data collection

As you navigate through and interact with our website, we may use automatic data collection technologies such as trackers and cookies to collect certain information about your device, browsing actions and patterns. Some of this information may be linked to you personally. This information is used to ensure our website functions correctly, helps us understand the needs of our members and may be used for the other purposes set out in this privacy policy. Examples of this information include:

- website traffic data, logs and other communication data
- data related to your use of our website, pages you visit, the resources and services that you access and download, the time you spend on each page, the date and time of your visit,

referring pages (pages you came from or go to) and statistical and other aggregated data derived from your use of our website

- information about your device, computer and network connection, including your IP address, operating system, hardware version and browser type.

The technologies we use for this automatic data collection may include trackers, log files, usage monitoring software and cookies. You can choose to refuse cookies by turning them off in your browser and/or deleting them from your hard drive. You do not need to have cookies turned on to use our website, but your experience may be affected.

The administration manager may monitor and record phone calls via the helpline for quality control or staff training purposes and other purposes related to the purpose for your call. We will let you know at the time if a call is to be recorded.

We may gather more extensive information about your interactions with our website or with us generally if we are concerned about abnormal website usage patterns or security breaches.

3 Non-provision

You may decide not to provide your personal information to us. However, if you do not provide it:

- we may not be able to consider or process your application in relation to the scheme, you may not be able to participate in the scheme and/or manage your investments in the scheme and we may not be able to pay you your investments, and/or
- we may not be able to provide you with the services you have requested or access to certain parts of our website or you may not be able to fully utilise all of our products and services.

4 Information others give us

We may receive your personal information from third parties if you have authorised them to disclose your personal information to us or from publicly available sources.

The collection and disclosure of that personal information by those third parties will be governed by the terms you have agreed with them.

5 Keeping us updated

It is important to us that the personal information we hold about you is accurate and complete. Please let us know as soon as possible if you think we may need to make changes to that information.

6 Using your information

We, the administration manager and any other third-party providers of services to the scheme may use your personal information to:

- process and assess any application to participate in the scheme and any applications, requests or queries in relation to the management of your investments under the scheme
- make a decision on your application(s)
- provide you with the services and/or information you request from us
- manage and administer the scheme
- carry out your instructions and action your choices for your investments in the scheme

- verify your information and your identity (including for your use of our website), carry out any checks through third parties (for example, your employer and government agencies such as Inland Revenue) for the scheme to comply with its obligations under applicable law (including the Anti-Money Laundering and Countering Financing of Terrorism Act 2009) and to assist you if you forget your username or password for any of the services we provide to you via our website
- assist in providing better services to you by tailoring them to meet your needs
- carry out member research and member surveys
- keep our website relevant and of interest to users
- customise our website to your preferences and to show you information that is most relevant to you and your interests based on the information you have provided to us or we have otherwise collected
- contact you via electronic message regarding your use of our website, your online account, the scheme, or other potential aspects of our website or the scheme we think you may be interested in
- assist us in performing our functions and activities
- communicate with you
- comply with our legal obligations.

We may use your personal information for any other purpose that may be stated to you at the time of collection or that you otherwise authorise. We might also combine data or information that we have collected about you with the information we collect from others for the purposes described in this privacy policy.

7 Sharing your information

We may disclose your personal information:

- within the scheme for the purposes set out above
- to the administration manager and other third-party providers of services to the scheme
- to the scheme's investment consultant and investment managers
- to government agencies such as Inland Revenue
- to third parties (for example, to your financial advisor(s) or your employer if you are applying to participate in the scheme) in accordance with the uses set out above and/or if you have requested or authorised us to do so
- to our contractors, suppliers and other third parties to enable them to provide services and products to us and you, including in relation to our website and the scheme
- when we believe it is appropriate to comply with the law, to facilitate court proceedings or protect our rights
- where we are authorised or required to do so by law.

8 Storage and security of your personal information

Our service providers may store your information on our behalf (for instance, the service providers described in section 7 (*Sharing your information*)).

We may also hold your personal information ourselves (for example, on servers or in physical files located at our premises).

We place a high priority on the security of the personal information we hold. We maintain our website and all associated data with reasonable technical, administrative and physical safeguards to protect against loss, unauthorised access, destruction, misuse, modifications and improper disclosure.

The information you enter on our website, including your scheme membership number, password and/or personal identification number ('**PIN**'), is stored securely by us and our service providers on their data servers.

While no computer system or information can ever be fully protected against every possible threat, we are committed to providing reasonable and appropriate security controls to protect our website and the personal information we hold.

You are responsible for ensuring your devices and internet browsers are secure and can support any security measures we use to protect your information. You are also responsible for maintaining the confidentiality of your password and/or PIN.

9 Data access and correction

Under the Privacy Act 2020, you have certain rights to request access to and correction of the personal information that we hold about you. To do so, please contact us using the details in section 11 (*Contacting us*).

10 Changes to this privacy policy

We may make changes to this privacy policy from time to time.

When we make changes, we will update this privacy policy on our website. We will also specify the date of the latest update to this policy at the top of the document.

11 Contacting us

If you have any questions about our privacy policy or any other matter, please feel free to contact us. You can reach us in one of the following ways:

Contact	Jenny Taylor, Privacy Officer
Phone	04 819 2657
Email	jenny.taylor@mercer.com
Mail	FireSuper, PO Box 2897, Wellington 6140