# SuperEasy Privacy Notice

*Last updated 10 May 2024*

This privacy notice describes how we collect personal information from you during our interactions with you, and how we use that information.

This includes information we collect when you use our website or other online services, or participate in our SuperEasy KiwiSaver Superannuation Scheme or Local Government Superannuation Scheme (also known as the SuperEasy Employer Scheme) (‘SuperEasy Schemes’).

If you submit any personal information to us through the online forms provided on our website or online member portal, that relates to your membership (or potential membership) of a SuperEasy Scheme, we may provide you with additional information about our use of your personal information. If there is any inconsistency between any statements we make in such additional information, and statements we make in this privacy notice, that additional information will take precedence.

1. About us

The SuperEasy Schemes are managed by Local Government Superannuation Trustee Limited (‘Trustee’) and administered by Civic Financial Services Limited, a company incorporated in New Zealand (company number 13271). In this privacy notice, references to ‘we’, ‘us’ or ‘our’ are references to Civic Financial Services Limited.

Our contact details are set out in paragraph 12.

1. Scope of this privacy notice and defined terms

When we collect, use, store and disclose your personal information, we do so in accordance with New Zealand privacy law.

In this notice, when we say ‘New Zealand privacy law’, we’re referring to the law that covers the collection, use, storage, and disclosure of personal information in force at the time that you interact with us, including the Privacy Act 2020.

By ‘your personal information’ we’re referring to information about the person reading this privacy notice. If you provide us with personal information of another person, paragraph 6 will apply.

1. Information we collect

We may collect the following information from you when you interact with us:

| Personal information collected | When collected | Why collected |
| --- | --- | --- |
| Information we require to enable us to provide our services and to administer the SuperEasy Schemes you are a member of, including:   * your name, contact details and address; * information about your employer, employment status, role, salary and other employment entitlements; * information about your family members and their relationship to you; * information about other KiwiSaver or superannuation schemes you are or have been a member of; * financial and tax information such as your bank details and IRD number; * your passport or other identification information; * your gender, date of birth, age and other demographic details. | When you or someone acting on your behalf provides that personal information to us, including when you create an account to use our member services portal, or when you submit information to us through the forms provided on our website or member services portal. | For all purposes relating to the provision of our services to you, including to:   * provide our services to you and improve our service offering; * to verify your identity and eligibility to use our services; * communicate with you and respond to communications from you, including a complaint or any assistance you have requested from us in relation to our services; * administer the SuperEasy Schemes; * facilitate our general internal processes; * to comply with our obligations under anti-money laundering and countering financing of terrorism laws, tax laws, financial services laws and other relevant laws; * to respond to requests for information by the authorities that enforce the above laws,   and for any other purpose that we notify you of at the time your personal information is collected, or any other purpose permitted by law. |
| Your IP address, location information and information about how you interact with our website at [www.supereasy.co.nz](http://www.supereasy.co.nz), our online member services portal, or any other online platforms or services provided by us, including information about the pages you visit. | When you use our online services, including our website and member services portal. | So we can provide our services to you and improve our service offering by better understanding how users interact with our online services. |
| All personal information we collect about you, including the above. | The circumstances described above, and otherwise during your interaction with us. | For the purposes set out in paragraph 8 (Other uses of your information). |

1. If you do not agree to provide us with your personal information

You don’t have to give us your personal information. But if you do not provide us with information, we may not be able to provide you withour services.

1. Information others give us

We might receive your personal information from third-parties, who you have authorised to disclose your personal information to us, for exampleyour family members, your employer, the IRD, other scheme providersor from publicly available sources.

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

1. Information you give us about other people

We may collect information about someone else from you, such as your family member (if your eligibility to use our services relates to your relationship to them).

If you do provide us with someone’s personal information, you must make sure you have that person’s authority to do so. By providing us with that personal information you confirm that you have communicated the information set out in this privacy notice to them, as well as any other information we provide to you at the time of collection about how we will use that personal information.

You must make sure that person knows that their information may be used by us in the circumstances set out in this policy or otherwise notified to you.

1. Cookies
   1. Cookies are pieces of information that are automatically downloaded to your computer or mobile device when you use a website.
   2. We use cookies for a few different reasons. Cookies make it easier for you to use our website and services in future visits (for example, by remembering who you are so you don’t have to keep signing in to your user account). Cookies also help us to monitor traffic and personalise our service offering to you.
   3. Sometimes, we use cookies to collect information about you as described in this privacy notice.
2. Other uses of your information

We only use your information in the way described in this policy, or if we’re permitted or required to do so under New Zealand privacy law.

In addition to the specific ways that we use your personal information outlined above in paragraph 3, we may also use your personal information:

* to respond to your requests, enquiries or complaints and other customer care related activities, and to communicate with you;
* to provide you with important notices and information about the services we provide to you;
* to provide you with information about other goods and services you may be interested in, if you agree to receive such information; and
* for any other purposes for which you have given permission.

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 notice.

1. Where your personal information is held

We do not engage external service providers to store your information on our behalf. We store your personal information ourselves – for instance, on servers controlled by us or in physical files located on our premises.

1. Sharing your information

We only share your information for the purposes described in this policy, or as otherwise permitted under New Zealand privacy law.

We may share your personal information with the Trustee, the manager and trustee of the SuperEasy Schemes, if you apply to be, or are, a member of a SuperEasy Scheme. The Trustee may use that information for the administration of the SuperEasy Schemes, to respond to any queries or requests for information by the Financial Markets Authority, to comply with its legal and regulatory requirements, or as otherwise permitted under New Zealand privacy law.

In addition to the specific ways that we’ve described throughout this notice, we may also share the personal information we hold about you with the following persons:

* any business that supports our services;
* your employer, if we need to do so in order to provide a service to you or respond to a request from you;
* persons to whom we may be required to pass your personal information by reason of legal, governmental or regulatory authority including the IRD, Financial Markets Authority and other law enforcement agencies and emergency services;
* our professional advisors, contractors, service providers, business associates, and others who have agreed to treat your personal information in accordance with this privacy notice; and
* any person or organisation as authorised by privacy law;

We may also share your information with our related companies for the purposes described in this notice.

1. Your rights

You have the right to:

* request access to personal information that we hold about you; and
* request that we correct personal information that we hold about you.

You may make such requests by contacting our privacy officer via the contact details provided in paragraph 12.

1. Contacting us

You may contact our privacy officer:

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| --- | --- |
| by post, at: | Civic Financial Services Limited  PO Box 5521  Wellington 6140 |
| by email, at: | [admin@civicfs.co.nz](mailto:admin@civicfs.co.nz) |

1. Keeping us updated

It is important to us that the personal data that 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 data.

1. Amendments

We may make changes to this privacy notice from time to time by publishing an updated version of this notice on our website. For any amendment which is significant, we will notify you through the contact details you have provided us.