# Rabobank Privacy Statement



At Rabobank, we have an in-depth knowledge of agribusiness and are passionate about supporting our farming clients to grow. For our online savings clients, growing their savings also means helping our farmers to grow the food we all put on our plates, as 100% of deposits are put back into the country, supporting New Zealand farmers and growers.

We also believe in old fashioned personal service and as part of that service, you share and trust us with your Personal Information. We take your privacy seriously and the purpose of our Privacy Statement is to inform you of our privacy practices and to assist you to make informed decisions about your Personal Information. We have included examples of the types of processing activities we generally carry out in the course of our business.

## Key concepts to assist your reading of this document:

When we use the terms Rabobank New Zealand, entity, we, our, us; it means each member of the Rabobank Group based in New Zealand, being:

- Coöperatieve Rabobank U.A. (New Zealand Branch)
- Rabobank New Zealand Limited

Each Rabobank New Zealand entity collects and processes the Personal Information it holds about you in accordance with its legal obligations under relevant New Zealand legislation.

#### **Personal Information**

Personal Information means any information about an identifiable individual. This includes an opinion, whether the information or opinion is true or not; or recorded in a material form or not. Common examples include your name and address, email, date of birth and also information such as your income.

Additionally, information relating to a sole trader or partnership is also considered Personal Information. Information relating to a legal entity (e.g. a company) is not Personal Information, but information relating to a legal entity's directors, contact person or representative does count as Personal Information.

#### **Processing of Personal Information**

Processing of Personal Information means any action that is performed on Personal Information. This includes the collection, recording, storage, organisation, alteration, use, transfer, disclosure (including the granting of remote access), transmission or deleting of Personal Information.

## Do we process your Personal Information?

We process Personal Information if we have or have had a business relationship with you. We also process Personal Information if we have had contact with you and/or your representatives or you wish to establish a business relationship with us.

We process Personal Information of:

- Clients and their authorised representatives;
- People in their capacity as security providers, (ultimate) beneficial owners and guarantors;
- People who show an interest in us or our products and
- services and have given their Personal Information to us (e.g. if you have visited our website or walked into a local branch); and
- People who are connected in another way with a business or organisation with which we have, or have had a business relationship (e.g. employees, executive directors or, contacts of service providers).

## What kinds of Personal Information do we process?

Types of Personal Information	What kind of Personal Information might be involved?	Examples of how we use Personal Information
Information that allows an individual to be identified directly or indirectly	Name, address, telephone number, e-mail address, information provided in your identity document such as driver's license number or passport number and biometric information.	<ul> <li>For identification purposes in compliance with laws;</li> <li>To prepare an agreement; or</li> <li>To contact you.</li> </ul>
Location information	Information that shows where you are.	To find out where and when you used your debit card. We do this to combat fraud. For example, the information provided by the ATM using your debit card.
Information relating to or used for providing financial products and services	Information about your financial situation, the products you have, your investment profile and information used for obtaining finance, such as pay slips and the value of your property.  This could also include Sensitive Information such as health information if relevant.	To assess whether a product is suitable for you e.g. if you have, or apply for, a loan with us, we want to determine whether this loan is appropriate.  We may also record your sensitive personal information where we have your consent, or where we have a lawful purpose to do so. Sensitive personal information may include information about your health and/or disabilities or other personal data which might be considered sensitive. Purposes for which this information may be recorded include;  Providing extra care and helping you to access your banking services when you are experiencing a vulnerability;  Reasons relating to financial hardship; or  If you want to use a modified security token to assist with a visual impairment.
Payment and transaction information	When a payment is made, information about the person you paid or who paid you, when the payment took place and what the balance in your account is.	<ul> <li>To execute a payment for you;</li> <li>To be able to check whether the bank account number entered matches the name that is specified in a payment instruction;</li> </ul>

#### Types of Personal What kind of Personal Information Examples of how we use Personal Information might be involved? Information Payment and transaction When a payment is made, information To pass your information on to the information about the person you paid or who paid other bank; you, when the payment took place and For your security and ours. For what the balance in your account is. example, if a payment is made in New Zealand and in another country at the same time, we may be able to take steps to help remediate; or To identify financial difficulty early. Information that tells us about Cookies To understand your behaviour (e.g. the use of our website and the webpages you have visited) and track **IP** address your preferences on our website. For app Information relating to the device more information refer to our Cookies on which you use our online page; services or our website. To combat fraud; Information about browsing To improve the functionality of our behaviour, browsing capabilities website; and preferences pages viewed, and browser type such as chrome or For displaying targeted adverts or safari. banners; or We use web analytics packages and our content management system to enable us to analyse information, learn about our visitors and measure the performance of our website and web content. Information we receive from Information obtained from public We use this information to check whether you can be granted credit, or other parties registers (e.g. New Zealand Company Office) or an individual's to check the value of a property; or credit history from a credit We may receive the Personal reporting body. y Information Information of multiple directors or obtained from other businesses ultimate beneficial owners of a who you have given consent to company from one representative share your information with us. within that company such as the CFO for the purposes of on boarding that company as a client.

## How do we collect your Personal Information?

The collection of most Personal Information will be directly from you and with your consent, which will usually be obtained at or around the time you contact us or take out a product or service with us. Examples include information when you enter into an agreement with us, information you enter on our website so we can contact you, and information arising from the services we provide in areas such payments.

With your consent, we may also receive your information from:

- Other financial institutions and enforcement agencies in the context of combating fraud, money laundering or terrorism financing;
- Suppliers or other parties we work with. For example, your credit history from a credit reporting body; and
- Another party who can share your information with us.

We may also obtain your information from public sources like newspapers, public registers (e.g. New Zealand Companies Register), websites and open sources of social media.

At or before the time or, if that is not practicable, as soon as practicable after, we collect Personal Information about an individual, we will take reasonable steps in the circumstances to let that individual know we have their Personal Information.

If your business or organisation transfers any Personal Information concerning employees, executive directors or ultimate beneficial owners to us, we expect your business or organisation to inform them about this. You can give this Privacy Statement to them so that they can learn how we deal with their Personal Information.

## What are Rabobank's legal bases and purposes for processing your Personal Information?

To provide you with the best possible service, we need to know you well and develop our client insights about you. In order to do that, we collect and process your Personal Information only where we have a lawful purpose to do so and when we deem it reasonably necessary for one or more of our functions or activities.

## Purposes for processing your Personal Information

To enter into a business relationship and agreement with you, we need to have your Personal Information if you want to become a client, or if you want to use a new product or service, or for us to contact you.

- When you become a client, we need to verify your identity to comply with our legal obligations. As part of this, we may retain copies of your identity documents.
- If you wish to become a client, or are already a client of ours, we will consult registers and warning systems of Rabobank New Zealand (internal registers) and the financial sector (external registers). We also check that you are not on any national or international sanction lists.
- We assess whether the requested product or service is suitable for you. For example, we assess whether we can provide you with credit. When making this assessment, we also use information that we obtain from other parties, such as credit reporting bodies.
- We use your financial information to assess whether we should provide you with a certain amount of credit. We may use for example, your balance information or the number of times a debit is reversed. We can also see if you use your credit and how much you use.
- We may use a credit rating as part of our assessment when deciding whether or not to grant you credit, to calculate the price you have to pay in the case of business financing and to identify payment arrears early.

To perform agreements and carry out instructions, we execute the instructions we receive from you and perform the agreements we have entered into with you. We process Personal Information to achieve this purpose.

- If you make a payment through us, we transfer your information to another bank. The payee can also see and record your payment information. Both the person who issues the payment instruction and the beneficiary (payee) may enquire about specific information relating to the other party's account.
- We make recordings of telephone conversations, e-mail messages, camera images and video chat sessions. The purposes for which this is done include proving that you issued a particular instruction. We may also do this to combat fraud, fulfil legal obligations, monitor and improve the quality of our products and services, and train, coach and assess our employees.
- If, for example, you are applying for a loan or you want to invest, then when assessing the application we can also include information about other products that you have with us e.g. a savings account. We can also take this information into account during the term of the provided service.
- We also provide you with information about the transactions in your bank account, or credit or financing, or, if you are at risk of falling behind on your payments, we will contact you to look for a solution.
- You may also ask us to disclose your Personal Information to a third party, in which case we will transfer your Personal Information to that party.

## To ensure your security and integrity as well as the security and integrity of the bank and the financial sector

We collect and use your Personal Information to protect you, the Bank and the security of the financial sector. We also do this for the purpose of preventing fraud, money laundering and the financing of terrorism.

#### **Customer Due Diligence**

We check whether we can accept you as a client when we enter into a business relationship with you and

## during that business relationship. For example, your transaction information may cause the Bank to conduct an enhanced due diligence on your account(s) and relationship with the Bank.

If you do not provide the Bank with all of the required information, we may not be able to continue our banking relationship with you.

## ii. Internal and external registers and warning systems

If you seek to become a client, or are already a client of ours, we will consult our internal registers and warning systems and, additionally, external registers available within the financial sector.

In addition, public authorities send us lists of individuals, which we have to enter in our internal registers and warning systems. These are individuals with whom financial institutions must not do business, or to whom the financial sector must pay extra attention.

#### iii. Publicly accessible sources

We consult publicly accessible sources, such as public registers, newspapers, the internet and public profiles of your social media, in an effort to combat fraud, money laundering and terrorism financing and protect the bank.

## iv. Fraud, Money Laundering and Terrorism Financing

We may perform analysis aimed at preventing fraud, money laundering and terrorism financing to assist in protecting you and the bank. For example, we may collect information in respect to your usual transaction behaviour in order to detect and reduce money laundering and terrorism financing. If the observed behaviour differs from your usual transactional behaviour or there are other indicators, this may form grounds for suspending or blocking payments by fully automated means.

We make recordings of telephone and video conversations, e-mail messages and camera images (at our branches), for example, and may document these recordings. We do this in the context of investigating fraud. We may also do this to fulfil legal obligations, monitor and improve the quality of our products and services, improve our assessment processes and train, coach and assess our employees.

#### To help develop and improve products and services.

In order to provide you with the best possible service and to continue to innovate and develop as a bank, we are constantly improving our products and services. We do this for our clients, ourselves and other parties.

- We sometimes combine information sources. such as information on the products you receive from us and the balance in your account.
- We also process information when analysing your visit to our website. We do this with the aim of improving our website and the experience you have. We use cookies for this. For more information refer to our Cookies page.
- Analysing Personal Information allows us to see how you use our products and services. We also use the results of analysis to categorise clients into groups, for example based on age. With this we create customer and interest profiles. In making these analysis we sometimes also use information that we have received from other parties, for example if we have received information from public sources such as the newspaper or the internet. You always have the right to object to this information processing.
- We naturally want to prevent you going into payment arrears or prevent you from getting into financial difficulty. For this we might use models in which we can compare your situation with other customers on the basis of their characteristics. We may also make use of your transaction information, reversals or other information that can help prevent financial difficulty. If we foresee that you might get into financial difficulty then we are happy to help you. We can do this ourselves or by pointing out possible organisations that can help you organise your financial administration.
- We also carry out research in order to improve our products and services. For example, we may ask you to give your feedback to a product or to review a product. However completion of such surveys is voluntary.
- We sometimes use other parties to process your Personal Information for this purpose, for example in order to measure or ask you how we can improve our services. In that case, these other

parties act on our instructions and in accordance with confidentiality obligations.

## For account management, promotional and marketing purposes

We process your Personal Information for account management, promotional and marketing purposes. In doing so, we use information we have directly obtained from you, such as payment information or information we have indirectly obtained via cookies, for example your activity on our website. We also collect Personal Information not obtained directly from you, including public registers and publicly available sources (such as the internet and social media).

- We may use your information to inform you about a product or service that might be of interest to you. We may use a third party service provider for this.
- We produce analysis and profiles for marketing and account management purposes. This allows us to combine your existing products from the bank with information relating to your visit to our website so that we can display information that is relevant to you. For example, if you accept our cookies we can present specific offers on banners on our website.
- We may collect your information together with providers of social network services if, for example, you post comments, videos, photos, likes and public messages on our social media company pages or post comments about us on a website or social network that we do not manage.
- We may also use analysis to provide our clients with information for benchmarking purposes. If we use your information for these analysis or produce profiles, we will ensure that your information is de-identified to the greatest possible extent and that they are made only available to a few employees at the bank.

If you do not want your information to be used by us for the purpose of direct marketing or by post, e-mail or telephone, you can let us know, refer to section 'What rights do you have to your Personal Information?' of this Statement for details or alternatively visit our Individual Rights portal.

Please note that from time to time, we may be legally obligated to contact you even if you have opted-out of direct marketing messages. These are known as service messages, which we need to send you.

To enter into and perform agreements with suppliers and other parties we work with

If you have contact with us in the context of a supplier arrangement or business partnership, we may process your Personal Information, for example so that we can establish whether you are permitted to represent your business or whether we can give you access to our locations. Where necessary, we may consult internal and external registers and warning systems before we enter into an agreement with you and also while the agreement is in effect.

#### To comply with legal obligations

#### Legislation

We have to collect and analyse a large amount of information relating to you and sometimes transfer such information to government authorities under various national and international legislation and regulations that apply to us and other members of the Rabobank Group.

For example, we must comply with legislation designed to combat fraud, crime and terrorism, such as anti-money laundering legislation in order to be able to offer you financial products and services.

We are required to perform customer due diligence and to conduct further enquiries if you hold specific assets or if an unusual transaction takes place in your account. If we observe an unusual transaction, we must notify the relevant law enforcement agency. We may be required by law to establish who the ultimate beneficial owner is of a business or organisation with which we have a business relationship.

We may receive requests for information from regulators and government agencies. If we receive such requests, we are required by law to cooperate with any request or investigation, and transfer information relating to you.

#### ii. Risk models

New Zealand regulations allow for us to produce risk models if you apply for a loan or credit or if you have received a loan or credit from us. This is so that we are able to determine which risks we are exposed to and

the size of the buffer we need to maintain. We process your Personal Information as part of this purpose.

We can also use these risk models before we offer you a credit. We may also use these models when determining the price for business financing, to prevent situations in which you are unable to repay your financing, or are unable to repay it on time. We may also use profiling and techniques for making decisions in partially automated manner.

These risk models may also predict how likely it is that you will fall behind on your payments. We can use the information they provide to prevent or deal more quickly with any payment problems, for example in consultation with you. We will then process your Personal Information for this purpose. We will do this for various reasons. These include performing our agreement with you and because we are required to do this by law.

#### iii. Providing information to the Government

Legislation and regulations may require that we transfer information (analysed or otherwise) relating to you to a Government institution, a tax authority or a regulator within or outside New Zealand.

## iv. Making and documenting recordings

We make recordings of telephone conversations, email messages and video chat sessions to comply with any legal obligations. We may also do this to fulfil legal obligations linked with record keeping, to monitor and improve the quality of our products and services, to combat and investigate fraud, or to train, coach and assess employees.

To carry out business processes and for the purpose of management reports and internal management

#### Determining credit risk associated with loans and credit facilities

Lending involves credit risk. We have to determine what that risk is, so that we can calculate the security we need to maintain. In connection with this, we process Personal Information relating to your loans and credit facilities.

#### ii. Audits and investigations

We also use your Personal Information to perform our internal and external audits and investigations, for example in order to examine how well new

rules have been introduced or to identify risks. We may engage a third party to assist with this.

#### iii. Improving our own business processes

We also use information to analyse and improve our business processes so that we can help you more effectively or make our processes more efficient, and to build management reports. We also have to validate the models we use. Where possible, we will de-identify or aggregate your Personal Information first.

## How long do we keep your Personal Information?

We do not keep your Personal Information for longer than is necessary to fulfil the purposes for which we collected the information or the purposes for which information is reused. We are required to keep some of your Personal Information for certain periods of time under certain legislation. We may keep the information for longer if, for example, we are requested by authorities for information to assist in an investigation, or if you have submitted a complaint, or there are ongoing legal proceedings.

When we no longer have a legal basis for using your Personal Information, we will delete, destroy or deidentify your Personal Information.

## Do we use automated decision-making including profiling?

Automated decisions are decisions that are made about you solely by computers without any human intervention. If these decisions have legal consequences for you, then we are not allowed to use automated-decision making. If automated-decision making is necessary to enter into or perform a contract, is authorised by law, or if you give us your explicit consent, then you have the right to consult someone at the bank and to express your point of view and contest the decision.

In the following situations we might use automated decision making that might affect you:

When you apply for credit from us, we may use a credit rating for you. This rating is used by authorised staff to determine whether or not you might receive credit. The decision to provide you credit is not fully automated.

When a payment is not in line with your usual pattern of spending, we might use automated decision making and stop the payment (temporarily). We do this to avoid fraud on your account. If we stop the payment, we will inform you as quickly as possible.

## Who has access to your Personal Information?

Within Rabobank New Zealand, your Personal Information can be accessed only by employees or individuals who need to have access, owing to their position. All of these people are bound by a duty of confidentiality. We have practices and policies in place to provide a high level of security to protect Personal Information.

We take all reasonable precautions to protect your Personal Information by:

- Regularly assessing the risk of misuse, interference, loss and unauthorised access to Personal Information we hold from both internal and external threats;
- Taking action to address any identified risks such as the use of dedicated secure networks or encryption when we send Personal Information electronically or the implementation of physical security measures to our locations;
- Conducting regular reviews and audits to assess the quality of the actions we have implemented.

## Do we use Personal Information for any other purposes?

If we want to use Personal Information for any purpose other than the purpose for which it was obtained, we may do this as long as the two purposes are closely related and you consent to us using the Personal Information for this purpose. We may also be required to do so in compliance with laws.

If there is not a sufficiently strong connection between the purpose for which we obtained the information and the new purpose, we will ask you to give your consent if we still want to use this information. You can always withdraw your consent. Please visit our Individual Rights Portal or section 'What rights do you have to your Personal Information?' of this Statement for more information on the rights available to you.

## Do we disclose your Personal Information to other parties and to overseas countries?

## Other parties

Depending on the product or service we provide to you, we may, with your consent, disclose your Personal Information to:

- Brokers, agents and intermediaries who refer your business to us;
- Valuers and insurers, if property is being provided as security
- for a loan from us;
- Other product and service providers for whom we act, so that they can provide you with the product or service you seek or have expressed an interest in;
- A person acting on your behalf, including your financial adviser, solicitor, accountant, executor, trustee, guardian or attorney;
- Other financial institutions and organisations at their request if you seek credit from them;
- Agents and other persons who assist us to dispose of property or equipment given as security for a loan;
- Other owners, borrowers and guarantors and their respective directors, trustees and beneficiaries (if any) related to any account you have with us, including an application for an account;
- Any party pursuant to any domestic or international law or regulatory requirement, including a court or tribunal or an overseas government instrumentality or regulatory body which has jurisdiction over any member of the Rabobank Group (including those outside New Zealand);
- Members of the Rabobank Group (including those outside New Zealand) and their associated entities; and
- If you have been referred to us, the person who made the referral.

#### **Outsourcing**

We may disclose your Personal Information to third party service providers when we outsource certain tasks and operations, including mailing, printing, direct marketing and information technology services.

Where we disclose your Personal Information to a third party service, we enter into contracts with confidentiality arrangements in place, so that these providers meet our privacy standards in protecting your Personal Information, comply with the New Zealand privacy legislation, and use or disclose Personal Information only for the specific service we have asked them to perform, or the product/service we have asked them to provide.

#### Securitisation

Securitisation involves the pooling and selling of assets such as loans to a special purpose vehicle. To undertake this process, we may disclose Personal Information to any person to whom our rights in pooled assets are to pass or proposed to pass and to any ratings agencies, trustees, investors and advisers involved in the transaction.

## Exchanging information with credit reporting agencies

We need to determine whether or not you are able to repay your loan when you apply to us for credit. We base our decision on your current financial position and on your credit history. This means that we will consider the information you give us in your application and may make enquiries with, and obtain further information, from a credit reporting agency.

We may collect, hold and disclose your credit-related information as reasonably necessary for our business purposes and as permitted by law, such as to make decisions as to whether to provide you with credit, evaluate your creditworthiness, manage credit provided to you, participate in the credit reporting system and providing information to credit reporting agencies.

We can only give your credit-related information to a credit reporting agency if we have told you first that we will do so and we can only obtain information about you from a credit reporting agency if we have your consent.

## Disclosure of Personal Information to overseas recipients

We may disclose Personal Information to overseas recipients, including to:

- Other members of the Rabobank Group for consolidated reporting and compliance purposes (including regulatory and legislative requirements of any member of the Group), the effective administration and management of facilities, storage of information and for marketing;
- Entities that provide services required to supply you with your products and services or provide services required by us for storage and hosting purposes; and
- Government or regulatory bodies (including in The Netherlands and the European Union) which have authority over any members of the Rabobank Group.

Where we disclose Personal Information overseas we take reasonable steps to ensure the recipient meets our privacy standards in protecting your Personal Information and complies with the New Zealand privacy legislation.

## What rights do you have to your **Personal Information?**

## Right of access to and correction of Personal *Information*

You may ask us whether we process Personal Information relating to you and request access to your information. If you believe your Personal Information has been processed incorrectly or incompletely, you may request that we change or supplement the information (correction).

## Right to restriction of processing

You may request that we temporarily restrict the Personal Information relating to you that we process. This means that we will temporarily process less Personal Information relating to you.

## Right to object to processing

If we process your information it is because we have a legitimate interest in doing so. You may object to processing of your Information, in that case, we will

reassess whether it is indeed the case that your information can no longer be used for a specific purpose. We will inform you of our decision, stating the reason. The operation of this right may impact the way we continue to provide you with products and services, we will inform you if this is the case so you may make an informed decision.

## Right to object to direct marketing

You have the right to request that we stop using your information for direct marketing purposes. If you advise us that you do not want to be contacted for direct marketing purposes, we will then take steps to ensure you are no longer contacted through the relevant channel.

We may be legally required to contact you even if you have opted-out of direct marketing messages. These are known as service messages, which we need to send you.

- For Rabobank New Zealand customers: If you wish to stop or change the channel in which we contact you, email us on fm.nz.maps@rabobank.com
- For Rabobank Online Savings New Zealand customers: If you wish to stop receiving marketing emails from us, let us know at www.rabobank.co.nz/unsubscribe/ or contact our Client Services Unit on 0800 22 44 33.

## How do you make a rights request?

To make a rights request to your Personal Information please visit our Individual Rights Portal. You may also contact us through the channels described in the section below.

## Do you have a complaint concerning the processing of your Personal Information?

If you have a general concern or complaint about the processing of your Personal Information held by us, we want to hear from you. In the first instance, please contact us by using the details below.

#### Rabobank New Zealand

Phone: 0800 500 933, Mon - Fri 8am - 5.30pm (New Zealand time)

If you're overseas call: +64 4 819 2783

#### **Rabobank Online Savings**

Phone 0800 22 44 33, Mon - Fri 8am - 6pm (New Zealand time)

If you're overseas call: +64 4 819 2870

Alternative contact methods can be found here: **Contact Us** 

We are committed to resolving any concern you may have quickly and fairly. We will acknowledge your complaint within two business days and our goal is to resolve it within five business days.

If we cannot resolve your complaint when we first hear about it, we will regularly update you about the progress of resolving the complaint.

In exceptional cases, we might require more time than we first anticipated to review a complaint and find a resolution. We will let you know if that happens and why. We will also let you know by what date we will have finalised our investigation.

If you are not satisfied with the resolution offered by Rabobank, you have the following options:

Have your complaint reviewed by the Customer Resolutions Manager who can be contacted by:

Email: fm.nz.CustomerResolutionNZ@rabobank.com

Post: Customer Resolutions Manager, Rabobank, PO Box 19373, Hamilton 3214

Access the external dispute resolution service provided by the New Zealand Banking Ombudsman Scheme who can be contacted directly by:

Online: www.bankomb.org.nz Email: help@bankomb.org.nz

Phone: 0800 805 950 (+64 4 915 0400 from overseas)

#### **Contact the New Zealand Privacy Commissioner:**

Email: investigations@privacy.org.nz

Phone: 0800 803 909

## Can we change this Privacy Statement?

We will review our Privacy Statement on a regular basis and that means that it may change from time to time. We will keep you informed of material changes to this Statement. You can always find the most current version of our Privacy Statement at https://www.rabobank.co.nz/

Latest version: August 2023

## How to contact the Privacy Officer?

If you have any general feedback or queries regarding the way Rabobank handles your Personal Information,

you may also contact the Privacy Officer by email at newzealand.privacy@rabobank.com.