

# ANZ Bangalore Policy for Privacy and Disclosure of Information

EXTERNAL POLICY | 02.12



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## Introduction

ANZ Operations and Technology Private Limited (ANZOT) and ANZ Support Services India Private Limited (ANZSSI) are two offshore service providers for the Australia and New Zealand Banking Group Limited (ANZBGL); the two Bodies Corporate, namely, ANZ OT & ANZSSI are hereinafter collectively referred to in this document as 'ANZ, Bangalore'. They provide Information Technology, Information Technology related, Information Technology enabled and back office services to ANZBGL, including ANZBGL's subsidiaries, affiliates and other ANZBGL companies. Both ANZ Bangalore and ANZBGL are independent legal entities doing business in different regulatory domains. Wherever it is legally permissible, ANZBGL policies and processes will apply.

ANZOT and ANZSSI are companies registered as per the provision of the Indian Companies Act, 1956 and are governed by various Indian Laws in force.

## ANZ Bangalore Privacy Policy, Practice and procedures

Protecting your privacy and the confidentiality of your personal information including your sensitive personal information is fundamental to the way ANZ Bangalore does business. The ongoing trust you have in us to protect your personal information is treated very seriously.

ANZ Bangalore is required, inter alia, to comply with the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules 2011 (the Rules) contained in the Information Technology Act 2000. These rules govern the way in which we collect, use, disclose, store, secure and dispose of Personal Information.

The rules require all Bodies Corporate in India handling or dealing in personal information including sensitive personal information or data of provider of information, to have a policy for 'Privacy and Disclosure of Information' and ensure that the same is published in compliance with the stated Regulatory requirements.

In addition, we have procedures and systems in place to protect your privacy whenever we collect, store, use, handle, transfer or disclose your personal

information (refer section “How ANZ Bangalore Implements this policy?” for details). You can request details about the information ANZ Bangalore holds about you and you have a right to ask for this information to be corrected.

## What is Personal Information?

### Personal Information

As per the Rules, ‘Personal Information’ means any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

The type of personal information we collect may include your name, mailing address, telephone number, e-mail address, Permanent Account Number for with holding taxes , date of birth, bank account number, annual income and other financial details, place of work, your or your dependent’s medical history or health condition.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via our website [www.anz.com](http://www.anz.com) and from third parties.

### Sensitive Personal Information

“Sensitive personal data or information” is defined in the rules to include data or information of a person that relates to:

- (i) Password;
- (ii) Financial information such as Bank account or credit card or debit card or other payment instrument details;
- (iii) Physical, physiological and mental health condition;
- (iv) Sexual Orientation
- (v) Medical records and history;
- (vi) Biometric information;
- (vii) any detail relating to the above clauses as provided to body corporate for providing service; and

- (viii) any of the information received under above clauses by body corporate for processing, stored or processed under lawful contract or otherwise (Example: your bank account details) provided that, any information that is freely available or accessible in public domain or furnished under the Right to Information Act, 2005 or any other law for the time being in force shall not be regarded as sensitive personal data or information for the purposes of these rules.

We will not collect, use or disclose sensitive information about you unless it is necessary to provide you with a service and we have your consent or unless we are legally required to collect, use or disclose that information.

## How ANZ Bangalore implements this Policy?

### 1. Collection and Use of Information

#### Why we collect Personal Information?

We collect Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. This includes:

- To make payments due to you for the services or goods supplied to you;
- To make statutory contributions like income tax, sales tax, VAT and other contributions on your behalf;
- To perform other administrative and operational tasks (including risk management, systems development and testing, staff training and research purpose);
- To prevent or investigate any fraud or crime (or a suspected fraud or crime); and
- As required by relevant laws, regulations, Codes and external payment systems.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to

use it. For example, we use health information provided in a life insurance application to assess the application. Once the insurance policy is put in place, you personal information is used to administer the policy and assess any claim made under that policy.

### **Your consent is important**

Whenever it is necessary to do so, we seek your consent in writing, in the form of a letter, e-mail, fax or in any other electronic form. You have an option to not provide or refuse to provide the information sought by us. However if you opt to not provide the required information, ANZ Bangalore may not be able to provide the related service to you.

### **How do we use your Permanent Account Number (PAN) or other government identifier?**

We only use and disclose these numbers for the purposes required by law, such as disclosing your PAN number to the Income Tax department or other regulatory/enforcement agencies.

### **We keep your personal information up-to-date**

If we have accurate information about you, it enables us to provide you with the best possible service. We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date at the time of collecting, using or disclosing the information.

### **We will correct personal information**

If you learn that the current personal information we hold about you is inaccurate, incomplete or out-of-date, you should contact us. We will promptly update any personal information that is inaccurate, incomplete or out of date. You also have the right to request that a statement be attached to your personal information if we disagree with your request to correct the information. Subject to some exceptions, you can find out what personal information ANZ holds about you.

## **2. Disclosure of Information**

Subject to the Rules ANZ Bangalore may need to disclose your personal information to:

- Your referee(s);
- An organisation that has an arrangement or alliance with ANZ Bangalore for the purpose of promoting or using their respective products and

services (and any agents used by that organisation in administering such an arrangement or alliance);

- Any service provider it engages to carry out its functions and activities;
- Regulatory bodies, government agencies, law enforcement bodies and courts;
- Other parties it is authorised or required by law to disclose information to;
- Other financial institutions (such as banks);
- Mortgage insurers and any reinsurer of any such mortgage insurer;
- Your guarantors (and intending guarantors);
- Any person who introduces you to it;
- Your authorised agents or your executor, administrator or legal representative.

### **What about disclosure of sensitive personal information?**

Sensitive personal information is usually used or disclosed only after obtaining your permission. However, we may have to share this information with Government agencies mandated under the law to obtain information including sensitive personal data or information for the purpose of verification of identity, or for prevention, detection, investigation including cyber incidents, prosecution, and punishment of offences or it may be disclosed to a third party in compliance with an order of the government or court.

In addition, we may disclose personal and sensitive personal information to third parties when we contract out some of our functions and activities. For example, we may provide names and addresses to an Income Tax consulting firm to help file tax returns on time. In these situations, we prohibit third parties from using your personal information except for the specific purpose for which we supply it.

## **3. Transfer of Information**

Subject to the Rules, we may transfer your personal information including sensitive personal information, to any other body corporate or person in India or located in other country to host or process personal information on ANZ Bangalore's behalf. When engaging a third party, including any ANZ Group

member, to host or process Personal Information, ANZ Bangalore will ensure that same level of data protection is adhered to by the third party as provided for under these rules.

For example we may need to transfer, or disclose your personal information to other ANZ entities (including ANZ BGL Limited) and/or to third parties where it is necessary to facilitate your employment. This may include medical practitioners, rehabilitation providers, insurers or other experts, agents, third party administrators and consultants to assist ANZ in relation to your employment.

We will obtain your consent to share your personal information with other ANZ companies and only share that information for the purposes to which you have agreed.

#### **4. Reasonable Security Practices and Procedures**

ANZ Bangalore in alliance with ANZBGL, has implemented a well defined Information Security Policy with practices that compare to the International Standard IS/ISO/IEC 27001 on "Information Technology - Security Techniques - Information Security Management System - Requirements". This policy with practices contains managerial, technical, operational and physical security control measures that are commensurate with the information assets being protected with the nature of business. This includes:

##### **We store your personal information securely**

We protect any personal information that we hold about you from misuse and loss. We also protect it from unauthorised access, modification and disclosure.

##### **We protect your information**

Your personal information can only be accessed by people who are properly authorised. Your personal information may be stored in hardcopy documents or electronically. We maintain physical security, such as locks and security systems, over our paper and electronic data stores and premises. We also maintain computer and network security, for example, we use firewalls (security measures for the Internet), identification codes and passwords to control access to computer systems and have reasonable security practices and procedures put in place.

##### **We destroy personal information we no longer need**

We will destroy personal information if it is no longer needed:

- For the purposes for which we collected it; or
- For the purposes of meeting legal requirements. We will properly dispose off all paper files, letters, correspondences and any other hardcopy documents that contain personal information that is no longer needed. All information stored in electronic form that is no longer required will be deleted from our systems.

##### **Website security and privacy**

The Internet has rapidly changed the way we do business. ANZ Bangalore continually maintains and monitors its online security systems to ensure your personal information is appropriately protected.

## **Resolving your concerns**

If you have grievances about the information we hold about you, please contact ANZ Bangalore's Grievance Officer whose details are provided below. The Grievance Officer will redress your grievances as expeditiously as possible. This will be within one month from the date of receipt of grievance. For redressing your grievance, we will need to verify your identity before giving you access.

##### **Sanjay Purandare**

Grievance Officer, ANZ Bangalore

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