



Fair Processing Notice

ANZ Europe SA

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Scope

1. This Notice is given by ANZ Europe S.A. (“ANZ”, “we” or “us”, “our”) to you (“you” or “your”). We act as a Controller for the Personal Data we collect about you or during the course of our dealings with you as our customer, about your employees, agents, consultants, contractors, directors, legal and authorised representatives, and those of associated entities such as employees and authorised representatives of your group companies or subsidiaries. If you are a vendor of ANZ, we collect Personal Data of your directors, legal and authorised representatives, individual contracts, contractors, sub-contractors/sub-processors or your employees who perform services under the vendor agreement with ANZ (the Personal Data of our customers and vendors is referred to as your “**Personal Data**”). This Notice also covers Personal Data we collect when you use our website. This means that we determine the purposes for and the manner in which we or our Processors process your Personal Data.
2. If you provide your ANZ Personal Data or you direct someone else to give their Personal Data to ANZ, you must show that individual a copy of this Notice so that they understand the manner in which their Personal Data may be processed. The terms ‘Controller’, ‘Processor’ and ‘Personal Data’ are as defined in GDPR. Personal Data relates to information of natural persons who reside in the European Union.

What this Fair Processing Notice covers

3. This notice covers:
 - (a) What Personal Data we collect about you;
 - (b) How we obtain your Personal Data
 - (c) Bases and purpose of processing;
 - (d) Recording communications with you;
 - (e) International Transfers of Personal Data;
 - (f) When we may disclose your Personal Data;
 - (g) Protecting your Personal Data;
 - (h) Your rights in relation to the Personal Data we collect;
 - (i) How long we will hold your Personal Data for;
 - (j) How we update or change this Notice; and
 - (k) How to contact us.

What personal data we collect about you

4. We may process the following types of your Personal Data (as is appropriate from time to time):
 - (a) First and last name, middle name, email address, home address and other contact details; Date of birth;
 - (b) Place of work;
 - (c) Place of birth and nationality;
 - (d) Identification documentation, such as copy of the passport or ID card for confirmation of identity purposes, driving licence, tax identification number or such other documentation as is required by local law. Copies of these documents may include a photograph of their face and shoulders;
 - (e) Transaction and account information;
 - (f) Job title
 - (g) Details of preferences for types of products or services, marketing events or materials in the context of their employment with you;



- (h) Details of access to our websites and applications including, but not limited to, traffic data, location data and other communication data (such as IP addresses), and the resources that are accessed;
 - (i) Authorised signatory lists including facsimiles of the signatures of your employees, agents, consultants, contractors, and those of associated entities employees, agents, consultants, contractors, directors, legal and authorised representatives, and those of associated entities such as employees and authorised representatives of your group companies or subsidiaries.
5. We do not collect or process “special categories of Personal Data” as defined in the GDPR.
6. In certain circumstances it may be necessary for you to provide us with your Personal Data, for example, to enable us to provide services to you or to comply with our legal obligations. In other circumstances, it will be at your discretion whether you provide us with Personal Data or not. However, failure to supply any of the Personal Data we may request may mean that we are unable to maintain or provide services or products to you. Your Personal Data will only be processed to the extent that it is necessary for the specific purposes notified to you.
7. We make every effort to maintain the accuracy and completeness of your Personal Data which we store and to ensure all of your Personal Data is up to date. However, you can assist us with this by promptly contacting us if there are any changes to your Personal Data or if you become aware that we have Personal Data relating to any of your employees, agents and contractors and those of your related entities which is inaccurate (see section 17 below). We shall not be responsible for any losses you suffer arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.

How we obtain personal data

8. We collect your Personal Data from the information you provide or permit to process when we manage or administer, a transaction, product or service and any additional information provided by you or others during the course of us providing or you receiving our banking and investment services including:
- (a) in requests, facility documentation, emails and letters, during telephone calls and conversations, for example, when registering for services, entering into terms and conditions, when conducting “know your customer” or other similar checks under all applicable laws and regulations, through our group company websites, in meetings and at corporate events and during financial reviews and interviews;
 - (b) from analysis (for example, the amount frequency, location, origin, and recipient) of your payments and other transactions, and your use of products and services involving other of our group companies and what they know as a result of operating your account, managing a transaction entered into with you, or providing you a product or service which are used to help us combat fraud and other illegal activity;
 - (c) information our group companies receive from each other, from or through other third party organisations (for example, credit reference agencies, insurance companies, brokers, social networks, and fraud prevention agencies) whether in the course of providing products and services to you or otherwise, and from information we gather from your use of and interaction with our applications, systems and platforms for banking and investment services and the devices you use to access them; and
 - (d) any other instances where you provide us with your Personal Data.
9. We will also collect information that is publicly available.



Fair and lawful processing

10. We will only process your Personal Data where:

- (a) the processing is necessary to comply with our legal obligations including:
 - i. to carry out money laundering, financial and credit checks and for fraud and crime prevention and detection purposes;
 - ii. to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies; and
 - iii. to comply with court orders and exercise and/or defend our legal rights, as otherwise permitted or required by any applicable law or regulation; or
- (b) the processing is necessary for the performance of a contract to which you are party, or to take steps at your request prior to entering such contract; or
- (c) the processing is necessary for our legitimate interests or the legitimate interests of others (except where such interests are overridden by the interests or rights of your employees, agents and contractors and those of your associated entities requiring the protection of their Personal Data) including:
 - i. for monitoring and assessing compliance with ANZ's policies and standards; for promotional and marketing materials and activities;
 - ii. to comply with court orders and exercise and/or defend our legal rights, as otherwise permitted or required by any applicable law or regulation;
 - iii. to identify persons authorised to trade on behalf of our clients;
 - iv. for administrative purposes in relation to the security and access of our systems, offices, platforms and secure websites and applications;
 - v. to contact you about the services and products we offer; and
 - vi. for any other legitimate business purpose including the reasons set out in section 15 below; or
 - vii. for performing the vendor contract to which you act as the service and/or product provider to us.
- (d) you confirm that your employees, agents and contractors and those of your associated entities consent to the processing of their Personal Data on the basis set out in this notice including in relation to the processing of Personal Data relating to racial or ethnic origin.
- (e) We may use your Personal Data for purpose of testing systems where encryption, tokenisation, hashing, or similar methods are used for the security of the underlying Personal Data. The testing is undertaken within group entities.

Recording Communications

11. We and persons acting on our behalf may record and/or monitor communications (including telephone conversations over landlines and mobile phones, emails, instant messaging, chat rooms, fax and other electronic communications) between your employees, agents and contractors and those of your associated entities and our employees, agents, consultants, contractors or other personnel and non- ANZ personnel/ individuals (such as employees of our clients). We only do this to the extent permitted by applicable law for legitimate business purposes or other purposes permitted or required by law. We collect this type of personal data for several reasons including but not limited to:
- (a) recording fact;
 - (b) complying with applicable law and regulation;
 - (c) complying with internal procedures and policies;
 - (d) facilitating administration and support;



- (e) assisting with security, crime prevention and fraud purposes; and
- (f) investigating or detecting unauthorised use, wrongful use or abuse of our services, systems or other materials.

International transfers of personal data

- 12. Because we are a global organisation, your Personal Data may be transferred from the European Union to and processed by entities within or outside our group of companies, including processing by our authorised vendors.
- 13. Where local regulations permit, your Personal Data will be processed in (including accessed in or stored in) for the purposes set out in clause 5 above in a country or territory outside the European Union (“EU”) by our group entities or authorised vendors to provide whole or part of the services agreed upon with you. We only disclose your information to these organisations when it is necessary for the services they provide to us.
- 14. In the event your Personal Data is transferred to organisations in third countries (i.e., country which has not been granted adequacy by the European Union), which may not offer the same level of protection of Personal Data as may be enjoyed within the EU, prior to such transfer of your Personal Data within our group entities or to a vendor, we undertake assessments and also ensure that we have adequate safeguards in place so that your Personal Data is treated securely and in accordance with applicable law and regulation and with our policies and standards. If you would like a copy of the safeguards we have put in place, please write to the contact address set out in clause 25 below.

When we may disclose your personal data

- 15. We do not and will not sell, rent or trade your Personal Data. We will only disclose your Personal Data in the ways set out in this Notice and in the following circumstances:
 - (a) to any entity within the Australia and New Zealand Banking Group Limited group of companies;
 - (b) to third parties who process your Personal Data on our behalf (such as our systems providers or authorised vendors);
 - (c) to third parties who process your Personal Data on their own behalf but through providing us or you with a service on our behalf (such as our agents, contractors, professional advisers, service providers that we engage to carry out or assist with our functions and activities including
 - (d) participants in payment systems and credit reference agencies);
 - (e) to any provider of a guarantee, security or other credit support for obligations to us;
 - (f) to financial institutions or regulatory bodies with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes;
 - (g) to any third party to whom we assign or novate any of our rights or obligations;
 - (h) to any prospective buyer in the event we sell any part of our business or its assets or if substantially all of our assets are acquired by a third party, in which case your Personal Data could form part of one of the assets we sell;
 - (i) to any government, regulatory agency, enforcement or exchange body or court where we reasonably believe that we are required to do so by applicable law or regulation or by any court or tribunal order or at their request where it is legal to do so; and
 - (j) to third parties including authorities for real time investigation to the extent and limited to the purpose of such investigation. At times the investigation may involve access, disclosure of transfer of personal data to third parties. However, the security of personal data is ensured in transit and processing by the third



party. We ensure that the third party protects personal data and maintains appropriate security measures to protect personal data from improper, unauthorised, unlawful or accidental disclosure, destruction, alteration, use, access, loss or damage.

Protecting your personal data

16. We are committed to safeguarding and protecting your Personal Data and we maintain appropriate security measures to protect your Personal Data from improper, unauthorized, unlawful or accidental disclosure, destruction, alteration, use, access, loss or damage.

Your rights in relation to the personal data we collect

17. You as an individual has the following rights in relation to your Personal Data:
- (a) **Right to access:** You have the right to request your Personal Data we process, including information on the purpose of processing, the categories of Personal Data, the recipients of such Personal Data and if the recipients are in third countries. We may charge a reasonable fee based on administrative cost.
 - (b) **Right to rectification:** You have the right to request correction of your Personal Data if it is inaccurate. You can also provide further personal data if the information is incomplete.
 - (c) **Right to erasure:** You have the right to request erasure of your Personal Data in instances such as withdrawal of consent or if Personal Data is no longer necessary in relation to the purpose for which it was collected. ANZ will delete your Personal Data under certain conditions and in accordance with Section 18 below.
 - (d) **Right to restrict processing:** You have the right to restrict processing of your Personal Data if it is not accurate; if no longer necessary in relation to the purpose for which it was collected, or if you have requested erasure of such data. However, this right is subject to certain conditions.
 - (e) **Right to object to processing:** You have the right to object to processing of your Personal Data by us, subject to applicable law and its requirements.
 - (f) **Right to data portability:** You have the right to request transfer of your Personal Data to organisations authorised by you, in specified conditions.
18. If you wish to update, modify/correct, delete or, access your Personal Data, receive a copy of the personal data collected from you, or if you would like us to stop processing any of your Personal Data, to the extent you are entitled to do so under applicable law, you can make such a request by writing to us at the address set out in section 25 below. We will respond to your request within the time prescribed by applicable law. If such changes are made pursuant to your request(s) this may affect our ability to continue to provide our services to you and in such circumstances, we reserve the right to terminate this Agreement on notice to you.
19. Any of the rights listed above, are dependent on our security obligations, including prevention of unauthorised disclosure of data, we can request to be provided with a copy of a valid means of identification and verification of the identity of the individual whose Personal Data is the subject of such a request.
20. Under French law, individuals have the right to set general as well as specific guidelines for the retention, erasure and communication of their personal data after their death. General guidelines relate to the entirety of personal data and can be registered with a digital trusted third party certified by the French Data Protection Authority (CNIL). Specific guidelines relate to the specific processing described in this Notice and concern Personal Data processed by us.



21. These rights can be exercised by contacting us as set out in Section 25 below. Individuals can also lodge a complaint about our Personal Data processing with a data protection authority. In France, the data protection authority is the Commission Nationale de l'Informatique et des Libertés, which can be contacted at the following address:

- **Commission Nationale de l'Informatique et des Libertés**
- 3 Place de Fontenoy 75007 Paris.
- **Phone:** +33 (0) 1 53 73 22 22

How long we will hold your personal data for

22. We retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. However, if you wish to have your Personal Data removed by exercising your right to be forgotten from our databases by making, such a request in writing to the address set out below in section 25. Subject to any legal or regulatory requirements, we will then delete this information, to the extent technically practicable.

How we update or change this notice

23. We may change or update parts of this Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating the relevant location sites on <https://www.anz.com/institutional/global/europe-sa/en/>

24. This Notice was last updated on September 2026.

How can you contact us

25. If you would like to contact us in relation to this Notice or anything else in connection with the Personal Data we collect about you, including, without limitation, where you would like to update your Personal Data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below.

- **Email :** ANZEuropeSA@anz.com
- **Post:** ANZ Europe SA, 54, avenue Hoche, 75008 Paris.

26. Alternatively, contact your ANZ representative, explaining that your communication is in relation to data protection.



Thank you

