



ABORIGINAL
INVESTMENT

0206 – Privacy Policy

November 2025

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1. Purpose

The purpose of this Privacy Policy is to outline how Aboriginal Investment NT handles, collects, uses, discloses and stores personal information.

This Policy enables Aboriginal Investment NT to meet its legislative requirements under the *Privacy Act* and *Australian Privacy Principles (APPs)*¹. By meeting these obligations, Aboriginal Investment NT can protect the privacy of individual's personal information when Aboriginal Investment NT performs its statutory functions with stakeholders, including community, the Commonwealth and Aboriginal Investment NT Personnel.

Aboriginal Investment NT is obliged to handle personal information in the manner required under the *Privacy Act 1988* (Cth) (Privacy Act) (see definitions below), including the APPs. These set out the obligations in relation to the collection, storage, use, disclosure, quality and security of personal information and access and correction rights of individuals in relation to their personal information.

2. Scope

All Aboriginal Investment NT Personnel must comply with this Policy. Aboriginal Investment NT Personnel includes directors, committee members, executives, employees, volunteers, contractors, consultants and agents of Aboriginal Investment NT.

This Policy contains information about how we collect, use, disclose and store personal information of Aboriginal Investment NT Personnel and other third parties, including sensitive information.

The objectives of this Policy are to ensure:

- the safe use of information by Aboriginal Investment NT Personnel
- that appropriate measures are in place to give effect to the Policy, and that all Aboriginal Investment NT Personnel have a clear understanding Aboriginal Investment NT's commitment to privacy
- that Aboriginal Investment NT Personnel are aware of their responsibilities in the implementation of the policy

¹ [Australian Privacy Principles quick reference | OAIC](#)

3. Definitions

Personal information: information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not
- whether the information or opinion is recorded in a material form or not

Sensitive information: a subset of personal information and includes information or an opinion about an individual's:

- racial or ethnic origin
- political opinions
- religious beliefs or affiliations
- philosophical beliefs
- sexual orientation
- criminal record
- health information
- genetic information

4. Roles and responsibilities

Position	Description
Board	• review and approve this policy • ensure the organisation complies with the requirements of this policy
Audit and Risk Committee	• endorse this policy • ensure the organisation complies with the requirements of this policy
Chief Executive Officer	• review this policy • approve immaterial policy changes after a review • ensure the organisation complies with the requirements of this policy.
Chief Risk Officer	• implement this policy • review the policy annually • provide training to employees on this policy • act as the Privacy Officer
All Staff	• comply with the requirements of this policy

	• promptly report any incidents or near misses related to privacy or data breach matters to the Privacy Officer including but not limited to situations where: ○ unauthorised access to personal data occurs ○ consent is not collected where required ○ there are instances of non-compliance with the policy
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5. Breach of policy

Where an employee fails to comply with the requirements set out in this policy, disciplinary action may be taken.

6. Why personal information is collected

Aboriginal Investment NT's purpose under section 65BA of the *Aboriginal Land Rights (Northern Territory) Act 1976 (Land Rights Act)* is to promote:

- the self-management and economic self-sufficiency of Aboriginal people living in the Northern Territory
- social and cultural wellbeing of Aboriginal people living in the Northern Territory

Aboriginal Investment NT achieves its purpose by performing functions set out in the *Land Rights Act*, including:

- making payments (grants) and providing financial assistance to or for the benefit of Aboriginal people living in the Northern Territory
- making investments in line with its legislative purpose

As well as performing other functions related to the purpose and functions of Aboriginal Investment NT under the *Land Rights Act* such as delivering projects, initiatives and supports, catalysing funding and supports from third parties, and conducting advocacy consistent with Aboriginal Investment NT's purpose.

Aboriginal Investment NT only collects your personal information for purposes that are directly related to, or reasonably necessary to perform, Aboriginal Investment NT's functions or to meet certain requirements as an employer.

7. What personal information is collected

In the ordinary course of business, Aboriginal Investment NT may collect and handle personal information including:

- name and contact details (including email and phone number)
- proof of identity
- bank account details
- position within your organisation
- financial information relating to you or your organisation (such as tax returns or income tax portal statements, financial statements, bills or utilities statements and bank accounts or statements)
- information about relevant capability, skills, experiences, qualifications, permits, registrations and/or licences you hold
- information on traditional links that you may have to land that is subject to a land acquisition or land management applications
- information about your interactions with us
- information about your grant or credit history or capacity, and
- in certain circumstances, sensitive information about individuals as required by other legislation such as employment (e.g., memberships, identification documentation, etc.)

In performing our functions, Aboriginal Investment NT may also collect other types of personal information that the *Privacy Act* defines as “sensitive information”. This could include information about your racial or ethnic origin, such as evidence or confirmation of Aboriginality certificate. Aboriginal Investment NT will only collect sensitive information:

- where the individual consents
- when the collection is authorised or required by law to do so, or
- the collection is otherwise allowed under the *Privacy Act*

When Aboriginal Investment NT considers an investment proposal, Aboriginal Investment NT will collect and store personal information. Personal or sensitive information is collected by Aboriginal Investment NT to comply with legislation such as, the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and the *Archives Act 1983 (Cth)*.

Aboriginal Investment NT recommends that individuals do not provide sensitive information to Aboriginal Investment NT unless specifically requested by Aboriginal Investment NT.

In general, Aboriginal Investment NT collect personal information directly from individuals by telephone, letter, email, face-to-face, any online applications or portals, or through our website. Aboriginal Investment NT will collect information directly from the individual, unless there is an exception in the *Privacy Act* that permits us to collect personal information from a third party.

We may collect your personal information from someone acting on your behalf in limited circumstances. For example:

- we may collect personal information about you from another member of your organisation, when a grant application or investment opportunity relating to your organisation is submitted by another individual
- we may collect personal information from a third party or authorised representative while handling and resolving queries or complaints, or when conducting or responding to an investigation

8. How personal information is used and disclosed

Aboriginal Investment NT collects, uses and discloses your information in the course of performing our functions, including for the following purposes:

- confirming identity
- confirming eligibility for Aboriginal Investment NT's programs and services, including to confirm whether you are an Aboriginal and/or Torres Strait Islander person
- obtaining, exchanging or verifying information about an application, including with credit reporting agencies
- assessing the suitability of an application for a financial product or service
- ongoing management of financial products and services
- management of supplier and stakeholder relationships, including requests for feedback
- assessing an individual's employment application and ongoing employment relationship
- complying with our obligations under law including the *Anti-Money Laundering and Counter Terrorism-Financing Act 2006* and the *Freedom of Information Act 1982*
- assessing current or future applications or requests for funding or supports
- managing, administering, reviewing, pricing or providing Aboriginal Investment NT funding and supports
- managing our relationship with an applicant, including investigating and responding to complaints and handling any disputes

- debt recovery, including identifying a previous debt or underspend or outstanding acquittal of any funding received from a Commonwealth or State or Territory body or organisation
- Minimising risk and preventing, identifying, investigating and warning of, actual or potential fraud, corruption, misrepresentation or other actual or potential unlawful or illegal activities or misconduct complying with disclosure requirements under any law binding on Aboriginal Investment NT
- facilitating or streamlining funding or support from another government entity
- preventing duplication of funding relating to the project or opportunity that is the subject of an application or request for funding or support
- confirming that an applicant has sought funding from another government entity in relation to your request for funding or support
- monitoring, evaluating and reporting on the performance of Aboriginal Investment NT-funded projects and investments
- assisting Commonwealth or State and Territory bodies or organisations in understanding demand for funding and supports
- advocacy and reform
- complying with required laws, regulations or codes
- complying with any other purpose as outlined to the consenting individual

Aboriginal Investment NT uses and discloses personal information for the purpose it was first collected. We will take reasonable steps to give you information about the reason for collection at the time of collection where practicable, or as soon as possible.

We may share this information with third parties for the reasons outlined above or where the law otherwise requires or allows. These third parties can include:

- employees to fulfil their duties
- Commonwealth or State and Territory bodies or organisations
- credit reporting bodies and other credit providers (such as banks, credit unions, and financiers)
- guarantors, or potential guarantors, for your Aboriginal Investment NT product or service
- credit enhancers, funders or other parties acting in connection with your Aboriginal Investment NT funding or support
- any party involved in securitising your facility, including the Reserve Bank of Australia, ratings agency, re-insurers and underwriters, loan servicers, trust managers, trustees and security trustees
- operators of deposit schemes and grants you have or intend applying for

- recognised external dispute resolution and complaint bodies including the Office of the Australian Information Commissioner, Commonwealth Ombudsman and Australian Human Rights Commission
- joint grant or investment applicants, borrowers or business partners
- our business partners, consultants, service providers and professional advisors (including debt collection agencies and digital grant and banking providers, lawyers, auditors, valuers and insurers and contractors who provide website, IT, marketing, administration and other services to support Aboriginal Investment NT)

Aboriginal Investment NT will only use and disclose your personal information for a secondary purpose if the *Australian Privacy Principle 6* allows it, including where you have consented to a secondary use or disclosure or you would reasonably expect Aboriginal Investment NT to use or disclose your personal information for the secondary purpose, and that purpose is related to the primary purpose of collection, or, in the case of sensitive information, directly related to the primary purpose.

Law enforcement and statutory requirements

Aboriginal Investment NT may be required to disclose personal or sensitive information to law enforcement agencies, courts, tribunals, regulatory agencies, or other government authorities under certain circumstances. Such disclosures will occur only where:

- disclosure is authorised or mandated by Australian law or a valid court order
- it is necessary for the prevention, detection, investigation, prosecution, or punishment of criminal offences or breaches of law
- it is to meet obligations under anti-money laundering, counter-terrorism financing, taxation, and fraud prevention laws
- disclosure is essential to ensure compliance with statutory reporting or regulatory requirements

Whenever Aboriginal Investment NT receives a request for information from law enforcement or a statutory authority, the following steps are undertaken:

- requests are reviewed for proper authority and legal basis
- only the minimum and most relevant information required by law is disclosed
- where possible, Aboriginal Investment NT will notify the individual (unless legally prohibited, e.g., by a secrecy provision or risk of prejudice to ongoing investigations)
- records are kept of every disclosure, including the legal instrument or reason for the request

Aboriginal Investment NT also cooperates with:

- The Office of the Australian Information Commissioner, the Commonwealth Ombudsman, and other complaint/dispute resolution bodies as necessary

- Commonwealth, State, and Territory regulatory authorities overseeing anti-fraud, public interest disclosures, and freedom of information requests
- Relevant agencies in matters involving risk to life, health, or safety, or where required to prevent or lessen a serious threat

Aboriginal Investment NT will not disclose information beyond what is required by law and takes all reasonable steps to verify the identity and scope of all legal and statutory requests.

Publication of personal information on Aboriginal Investment NT's website

Aboriginal Investment NT may publish personal information of individuals on its public website where the individual's organisation has received funding from Aboriginal Investment NT. Information is published for transparency and accountability purposes, to ensure that Aboriginal Investment NT funds are used for the purposes for which they were intended and, in the manner, agreed with Aboriginal Investment NT.

Publishing such information on Aboriginal Investment NT's website will result in an individual's personal information being available to a person who is not in Australia, who is not a part of Aboriginal Investment NT, or is not a part of the individual's organisation.

Publication on Aboriginal Investment NT's website may be considered a 'disclosure' under the *Privacy Act*. Aboriginal Investment NT only discloses an individual's personal information where consent has been obtained from the individual, or where disclosure is allowed under *Australian Privacy Principle 8*.

9. How personal information is stored

Aboriginal Investment NT takes seriously its obligations to protect the personal information it holds. Aboriginal Investment NT takes reasonable steps to protect your personal information against misuse, interference and loss, and from unauthorised access, modification or disclosure. These steps include:

- classifying and storing records securely as per Australian government security guidelines
- internal access to information is on a 'need to know' basis and only by authorised personnel
- monitoring system access which can only be accessed by authenticated credentials
- ensuring our buildings are secure
- regularly updating and auditing our storage and data security systems

10. Notifiable data breaches

If Aboriginal Investment NT becomes aware of a data breach or possible data breach, we notify the Office of the Australian Information Commissioner (OAIC) and affected individuals of any data breaches which meet the criteria for an 'eligible data breach' as required by the Notifiable Data Breaches scheme (NDBs).

Under NDBs, an eligible data breach occurs when the following criteria are met:

- there is unauthorised access to, or disclosure of personal information held by the organisation (or information is lost in circumstances where unauthorised access or disclosure is likely to occur)
- this is likely to result in serious harm to any of the individuals to whom the information relates
- the organisation has been unable to prevent the likely risk of serious harm with remedial action

Upon breach identification, a formal assessment will be conducted using the Notifiable Data Breach criteria, and all affected parties will be advised without unreasonable delay.

Action plans will be created to contain, remediate and prevent further breaches. All staff are required to report data breaches or security incidents immediately.

11. Access and correction of personal information

Individuals have the right to access any personal information that the Aboriginal Investment NT holds about them and to request correction of such information. The request should specify the information requested and providing contact details including an email address or mailing address.

Aboriginal Investment NT may require anyone who asks to access their personal information to verify their identity to ensure that personal information is not disclosed to unauthorised people. No charge will be applied for lodging a request to access or correct personal information.

Aboriginal Investment NT will respond to requests for access or correction within 30 days.

The *Privacy Act* allows Aboriginal Investment NT to refuse access in certain cases, including where release of the information is exempt under the *Freedom of Information Act 1982* (Cth).

Where we have refused access or correction, we will provide reasons in writing. If you are unhappy with the response we provide, you may make a formal application for access or correction of personal information under the *Privacy Act*.

12. Complaints

If you are not satisfied with how we have collected, used or disclosed your personal information, you can make a complaint to complaints@aboriginalinvestment.org.au.

The complaint should include:

- a short description of your privacy concern
- any action or dealings you have had with Aboriginal Investment NT personnel to address your concern
- your preferred contact details so we can contact you about your complaint

Aboriginal Investment NT's Privacy Officer will endeavour to respond to complaints within 30 days.

If we do not resolve your privacy complaint to your satisfaction, you may lodge a complaint with the [Office of the Australian Commissioner \(Oaic\)](#).

13. Contact

Any requests for information about this policy, requests to access personal information, requests to correct records, or complaints about the Aboriginal Investment NT's obligations under the Privacy Act should be made in writing to the Privacy Officer at Aboriginal Investment NT:

Aboriginal Investment NT Privacy Officer,

PO Box 4623 Darwin NT 0800,

info@aboriginalinvestment.org.au,

phone 1800 943 039

14. Employees awareness and training

Aboriginal Investment NT will support employees and associates to understand their role in managing obligations under this policy by providing education, training and information. Relevant training will be provided to all employees at least annually.

15. Review

Aboriginal Investment NT's Privacy Officer is responsible for ensuring the review of this Policy and for its monitoring and evaluation. These activities will be overseen and endorsed by the Audit and Risk Committee, with all changes to be approved by the Aboriginal Investment NT Board. Reviews should occur on a biennial basis or whenever required by legislative changes.

If you have noticed any omissions or errors in this Policy, please inform the Aboriginal Investment NT CEO.

16. Related information

- Code of Conduct Policy
- Complaints Policy
- Freedom of Information Policy
- Privacy Act 1988 (Cth)
- Freedom of Information Act 1982 (Cth)
- Public Governance, Performance and Accountability Act 2013 (Cth)
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
- Archives Act 1983 (Cth)
- Australian Privacy Principles
- Notifiable Data Breaches scheme

17. Version control

Version	Description	Author	Date
1.0	Initial draft	PIC	29 August 2022
2.0	Revised July 2024	AGS/Aboriginal Investment NT	July 2024
3.0	Review	Risk Unit	October 2025

18. Approval

Name	Position	Approval date	Review
1.0	Acting CEO	9 December 2022	9 December 2023
2.0	CEO	4 April 2025	April 2027
3.0	Aboriginal Investment NT Board on the recommendation of the ARC	November 2025	November 2026