



ABORIGINAL **INVESTMENT**

Privacy Policy

April 2025

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1.0 Policy Statement.

This Privacy Policy (policy) details the steps (Aboriginal Investment NT takes to protect the privacy and personal information of individuals. This Policy details how Aboriginal Investment NT collects, uses, discloses and stores your 'personal information'

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 [Australian Privacy Principles](#) (**APPs**, see Appendix 1). 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.

1.1 Purpose

The purpose of this privacy policy is to clearly explain how Aboriginal Investment NT handles your personal information, and to let you know about the sorts of personal information we collect and hold.

This Policy enables Aboriginal Investment NT to meet its legislative requirements under the Privacy Act and Australian Privacy Principles (APPs). By meeting these obligations, Aboriginal Investment NT is able to 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.

1.2 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.

1.3 Overview

The objectives of this Policy are to:

- Ensure the safe use of information by Aboriginal Investment NT Personnel.
- Ensure 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; and
- Ensure that Aboriginal Investment NT Personnel are aware of their responsibilities in the implementation of the policy.

2.0 Definitions.

- **‘Personal information’** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
 - whether the information or opinion is true or not; and
 - whether the information or opinion is recorded in a material form or not.
- **‘Sensitive information’** is 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

3.0 Purposes for which Aboriginal Investment NT collects Personal Information.

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; and
- To promote 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.

4.0 What Personal Information is collected.

The types of personal information Aboriginal Investment NT collects depends on if you are a member of the public, an applicant for Aboriginal Investment NT funding or support, and whether you are a corporation, business or a related individual or employee. The information Aboriginal Investment NT collects and handles may include:

- 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; and
- Information about your grant or credit history or capacity.

In performing our functions, we may also collect other types of personal information that the Privacy Act defines as "sensitive information" about you. This could include information about your racial or ethnic origin, such as evidence or confirmation of Aboriginality certificate. We will only collect sensitive information:

- where you consent;
- when the collection is authorised or required by law to do so; or

- the collection is otherwise allowed under the Privacy Act.

In general, we collect your personal information directly from you when you deal with us by telephone, letter, email, face-to-face, any online applications or portals, or through our website. We will collect information directly from you, 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; or
- we may collect personal information from a third party or authorised representative in the course of handling and resolving queries or complaints, or when conducting or responding to an investigation.

5.0 How Aboriginal Investment NT uses and discloses Personal Information

We collect, use and disclose your information in the course of performing our functions, including for the following purposes:

- Contacting you;
- Confirming your identity;
- Confirming your 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 you, including with credit reporting agencies;
- Assess your current or future applications or requests for funding or supports;
- Managing, administering, reviewing, pricing or providing Aboriginal Investment NT funding and supports (including to you);
- Managing our relationship with you, including investigating and responding to complaints and handling any disputes with you;
- 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 and investigating fraud, corruption and other illegal activities;
- 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 your application or request for funding or support;
- Confirming that you have 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.

Aboriginal Investment NT uses and discloses your 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 your information with third parties for the reasons outlined above or where the law otherwise requires or allows. These third parties can include:

- Commonwealth or State and Territory bodies or organisations
- Your current or previous employers;
- 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.

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.

6.0 How Aboriginal Investment NT stores Personal Information

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; and

- regularly updating and auditing our storage and data security systems.

7.0 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. Your request should specify the information you are seeking or correcting and provide your 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. You will not be charged for lodging a request to access or correct your 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 give you 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.

8.0 Complaints

If you are not satisfied with how we have collected, used or disclosed your personal information, you can make a complaint to Aboriginal Investment NT's Privacy Officer.

Your 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; and
- 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 \(OAIIC\)](#).

9.0 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

10.0 Biennial 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, then please inform the Aboriginal Investment NT CEO.

11.0 Related Legislation and Policies

- Aboriginal Investment NT Employee code of conduct
- Aboriginal Investment NT Code of conduct breaches policy
- **Privacy Act 1988** (Cth)
- **Freedom of Information Act 1982** (Cth)
- **Public Governance, Performance and Accountability Act 2013** (Cth)

12.0 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

13.0 Approval

Version	Position	Approval date	Review
1.0	Acting CEO	9 December 2022	9 December 2023
2.0	CEO	4 April 2025	April 2027

Appendix 1 Australian Privacy Principles

Principle	Title	Purpose
APP 1	Open and transparent management of personal information	Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.
APP 2	Anonymity and pseudonymity	Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.
APP 3	Collection of solicited personal information	Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of sensitive information.
APP 4	Dealing with unsolicited personal information	Outlines how APP entities must deal with unsolicited personal information.
APP 5	Notification of the collection of personal information	Outlines when and in what circumstances an APP entity that collects personal information must tell an individual about certain matters.
APP 6	Use or disclosure of personal information	Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.
APP 7	Direct marketing	An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.
APP 8	Cross-border disclosure of personal information	Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.
APP 9	Adoption, use or disclosure of government related identifiers	Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier or use or disclose a government related identifier of an individual.

Principle	Title	Purpose
APP 10	Quality of personal information	An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.
APP 11	Security of personal information	An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.
APP 12	Access to personal information	Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.
APP 13	Correction of personal information	Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.