



## Our Privacy Policy

### 1 Purpose

Many Rivers Microfinance Limited is required by law to comply with the Privacy Act 1988 (Cth) (the Act), including the Australian Privacy Principles (APPs). We take our privacy obligations seriously and this Policy outlines our privacy practices. It explains how:

- (a) we collect and manage your personal information
- (b) you may access and request correction of any record containing your personal information
- (c) you may make a complaint about a breach of privacy.

### 2 Scope

The Policy applies to our staff, volunteers, contractors and suppliers who handle personal information collected by Many Rivers Microfinance Limited and its related entities from time to time.

It applies to personal information for individuals that are external to us such as donors, clients and suppliers (you, your).

By providing your personal information to us, you consent to the use, storage and disclosure of that information as described in this Policy.

### 3 How we manage your Personal Information

We will:

- take all reasonable steps to ensure we are open and transparent about the way we manage your personal information
- maintain adequate security of personal information to seek to protect it from misuse, interference and loss from unauthorised access, modification or disclosure
- establish reporting channels to receive privacy inquiries from you and for reports of privacy breaches to be received and acted upon
- conduct risk assessment for all new and significant business projects which consider privacy impacts
- provide an option for you to use a pseudonym or otherwise be anonymous unless it is impermissible, impractical or inhibits the adequacy or quality of service provided to you
- appoint a Privacy Officer to oversee privacy governance processes, ensure compliance with the APPs and report on privacy issues to our Executive Team and the Board
- provide this Policy free of charge and in an appropriate form for public access
- provide relevant work training and privacy awareness on how the APPs apply to us and how they are reflected in privacy practices, procedures and systems
- periodically review this Policy as well as the privacy practices, procedures and systems across our organisation to ensure that they remain appropriate to the changing environment we operate in and will notify you by posting an updated version of this Policy on our websites.

### 4 Personal Information we collect and hold

#### 4.1 Kinds of Personal Information

We will only collect information about you that is reasonably necessary for our functions or Activities which are listed under point 4.3. This may include:

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Local enterprise development | Practical business support | Access to finance | Journey with people

ABN 58 128 486 788

- your name, address, contact and bank details for clients, volunteers, suppliers and donors
- your image, video and sound recordings
- information associated with web browsing, email, text messaging, phone calls or other electronic interaction with you including your phone number and user name
- for donors, details relating to your donations
- for others, other information relevant to the purpose of providing services such as family and living circumstances, education qualifications, employment history, financial information including income, tenancy details, rental history and tenancy reference checks, interests, feedback preferences, user names and passwords, guardianship and service feedback and complaint details
- sensitive information about you that may include your gender, age, date of birth, health, disability, mental health, racial or ethnic origin, criminal convictions, and other particulars required as part of our funding obligations and/or that are relevant for the proper provision of the services that we provide
- survey and questionnaire responses

#### 4.2 How we collect and hold Personal Information

Where possible, personal information is collected directly from you with your consent at the time of your interaction with us. In some services, personal information:

- is received from third parties where you are transferred or referred to us for the services that we provide; or
- transferred between our own services provided it relates to the primary purpose for which it was collected.

Personal information may be collected in hard copy form or electronic form. Hard copy records are required to be held securely. We hold electronic records in databases with security safeguards. Some of those databases are held by a third-party provider.

Where consent to collection is sought, it is sought voluntarily from you and we will inform you of what you are consenting to. Our consent agreements are current and specific to the services to be provided to you.

We will not collect sensitive information about you unless you have consented; it is required by law; or in other special specified circumstances, for example relating to health services provision and individual or public health or safety.

#### 4.3 Purposes for which we collect, use and disclose Personal Information

We collect, hold and use personal information only for the primary purposes for which it was collected or as set out below including:

- to provide services which may include, business support, financial support, financial products, business services and products, social and economic development services, counselling, education, volunteering, learning and development and fundraising.
- Personal information may be shared between more than one legal entity within Many Rivers Microfinance Limited to provide, expand or improve the services we provide to you or assist with more efficient service delivery
- to comply with the requirements of funding bodies as part of a funding agreement with us
- to operate fundraising and charitable activity in support of our objectives
- to provide customer service functions, including handling customer enquiries, complaints and feedback
- to facilitate proper governance processes such as risk management, incident management, internal audit and external audits

## MANY RIVERS MICROFINANCE LIMITED

- to gather feedback from you and other individuals about the quality of services that we provide so that the services we provide can be continuously improved
- to undertake marketing, fundraising and promotional activities, events and conferences organised and held by us
- to satisfy legal obligations, comply with applicable laws and meet the requirements of bodies which regulate the services we provide
- also to understand, through aggregated information, trends and patterns which we use for research and advocacy
- to fulfil other purposes which you have consented to.

#### 4.4 Disclosure to third parties

We will not disclose your personal information to other external organisations except:

- as required by funding agreements
- as required by law
- for transfer to another service provider in accordance with funding agreements
- where we have your consent to do so through your acceptance of this Policy and the disclosure relates to the goods or services we provide to you
- for a purpose permitted by this Policy; or
- if you request us to do so.

Examples of organisations and/or third parties that your personal information may be provided to include:

- external service providers where you are transferring to a service provider that is not part of us
- a government agency, as required by our funding agreements (which may be for example by portal directly into the agency's database system)
- third party service providers who assist us with the delivery of services or who provide services to or partner with us to enable us to deliver services, or in undertaking quality assurance of our services
- third parties service providers who assist us with fundraising activities or strategy or in analysis of our fundraising activities, strategy or patterns (including data collectives)
- third parties who assist us with co-ordination of volunteers, community activities and advocacy
- government or non-government agencies where we have a reasonable concern regarding your safety or wellbeing
- third parties who collate and/or analyse information for the purposes of research and advocacy
- third parties for the electronic storage of information, some of which may be overseas

Whilst we seek to ensure through our contracts with external parties that they comply with the Act regarding the use of your personal information, we have limited control around how some external parties (for example, government agencies) use your personal information.

#### 4.5 Opt-outs

If you do not wish to receive marketing or promotional communications from us, you should 'unsubscribe' online where a link is provided. In other circumstances, you should contact us on the email address below and we will cease the relevant marketing or promotional communication:

Email: [privacy@manyrivers.org.au](mailto:privacy@manyrivers.org.au)

Where we are providing services to you, we need to be able to communicate with you in relation to

## MANY RIVERS MICROFINANCE LIMITED

those services.

## 5 How you can access and correct your Personal Information

### 5.1 Access

You are entitled to request access to the personal information held by us about you. This is generally provided upon your request subject to completion of our verification and risk processes and to access restrictions imposed or permitted by law. Requests are made to the same point of contact to whom you provided your personal information.

### 5.2 Correction

Where you inform us that information held by us about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will correct it where we agree with you. Notices by you to us to amend information held about you are made to the same point of contact to whom you provided your personal information.

If, having received and considered an application from you to amend your information, we do not consider that the information should be amended, we will not amend it, but we will include a note with the information that you consider that it should be amended and advise you accordingly.

## 6 Overseas Disclosure

We may store personal information that we collect about you with third parties who store it overseas for our use. We do not disclose personal information about you overseas without your consent.

You are taken to expressly agree and consent to the transfer, storing or processing of your personal information outside of Australia in submitting it to us. In providing consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection requirements as Australia in relation to personal information.

If you do not agree to the transfer of your personal information outside Australia, you should contact Many Rivers Microfinance Limited's Privacy Officer at:

Email: [privacy@manyrivers.org.au](mailto:privacy@manyrivers.org.au)

Phone: 1300 626 974

Post: Many Rivers Microfinance Limited Privacy Officer, Level 21, 233 Castlereagh Street, Sydney NSW 2000

## 7 Retention of personal information

We will retain your personal information in accordance with applicable laws or requirements of any government or other funding body's record-keeping requirements.

## 8 Mandatory Notifiable Data Breaches

We will comply with the notification and other requirements of the Act where your personal information held by us has been inadvertently lost or disclosed or improperly accessed and that loss, disclosure or access may result in serious harm to you.

## 9 What to do if you have a privacy enquiry or complaint

If you have an enquiry or a complaint concerning collection, use or management of your personal

## MANY RIVERS MICROFINANCE LIMITED

information, please direct your enquiry or complaint to the staff member who is your ordinary contact. Our staff will outline options regarding how your enquiry or complaint may be resolved. We will aim to respond and resolve your enquiry or complaint in a timely and appropriate manner. If we don't, you may:

- take it to a more senior staff member, and/or
- call us on 1800 626 974

Where none of the above approaches by you has resolved the issue, your enquiry or complaint should be put into writing and forwarded to:

Many Rivers Microfinance Limited Privacy Officer  
Level 21, 233 Castlereagh Street, Sydney NSW 2000

or email: [privacy@manyrivers.org.au](mailto:privacy@manyrivers.org.au)

We will treat your enquiry or complaint confidentially. You may contact the Australian Information Commissioner wherever you believe that your rights to privacy have been breached by us.

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