

ARTF Privacy Policy

Last updated: 15 March 2019

The Australian Military Forces Relief Trust Fund (ARTF) manages your personal information securely and in accordance with Australian law, including the Privacy Act 1988 (0th) (Privacy Act) and (where applicable) the Privacy (Credit Reporting) Code 2014 (0th) (Credit Reporting Code).

1. Purpose of this policy

This policy explains how we deal with personal information (including credit-related information) in relation to the administration of ARTF loans and grants. This Policy may change from time to time. We recommend you visit our website frequently to ensure you remain aware of any changes or updates to this policy.

2. Information we collect about you

Personal information

'Personal information' is defined in the Privacy Act, and broadly covers any information that can reasonably identify you.

When you make an application for a loan or grant, we collect such information as we reasonably require to assess your application, and administer and manage the loan or grant agreement. This information includes:

- **identifying and contact information** such as your name, date of birth, contact details (address, phone number, email address) and information about your relationship, partner and dependants.
- **service information** such as PM Keys number, current rank and unit and employment history;
- **financial details** such as information contained on your payslips, bank account details and information about your income, expenses, assets and liabilities;

loan or grant details such as the amount sought, and the purpose of and reason for the loan or grant which may include sensitive information such as health and medical information about you or a family member (e.g. if this is relevant to a hardship application).

Credit related information

In this policy, 'credit-related information' refers to 'credit information' and 'credit eligibility information' as defined in the Privacy Act. Generally speaking, credit-related information covers information such as identifying details, credit history, and information about credit worthiness that we derive from all of the information you provide to us.

The kinds of credit-related information that we may collect about you may include:

- credit application history with the ARTF;
- repayment history information;
- information relating to credit-related court proceedings;
- personal insolvency information.

Over the course of our relationship with you, we may also collect and hold information obtained during that period, including transactional information and information provided through complaints or enquiries.

3. How we collect personal information

We collect personal information in the course of our dealings with you in relation to your loan or grant application. We will take reasonable steps to notify you about why we are collecting your information, and how we will deal with it, at the time of collection.

A link to the ARTF loan agreement privacy collection notice is included in the ARTF loan agreement form.

We generally collect personal information directly from you or the person making the loan or grant application. Other third parties that we may collect your personal information from include:

- your Commanding Officer and approving supervisor in the Army;
- referees listed in your application;
- the Department of Defence (e.g. employment related information such as payslips, and confirming that you are a current or former member of the Army);
- your executor or legal representative; and
- your administrator if you declare bankruptcy.

4. Collecting information through our website

The ARTF collects certain information when you contact us or make an application through our website (<http://www.armyrtf.com.au>).

Cookies

Our website uses cookies to improve the user experience and functionality of our website. Cookies are small data files sent from a web server to a web browser on the user's computer or device, and is stored on the user's computer or device. Cookies do not collect personal information.

If you do not wish to receive cookies, you can set your browser preferences so that your computer or device does not accept them.

Website analytics

We use Google Analytics to collect data about your interaction with our website, which is hosted by a third party. The sole purpose of this collection is to improve website user experience. Google Analytics uses cookies and JavaScript code to collect data and anonymously track how users interact with our website. This may include your IP address, geographic location (country only), browser and device type, pages viewed, date and time when webpages were accessed, and documents downloaded.

Google Analytics does not track activity within the online applications section of our website.

5. How we use and disclose information

Personal information collected by us in relation to a loan or grant will be used and disclosed in connection with that purpose, unless otherwise authorised or required by law (including the Privacy Act). This includes:

- confirming your identity;
- assessing your application (including your credit worthiness and ability to repay a loan);
- administering and managing your loan (if your application is successful);
- detecting and investigating suspected fraud or other unlawful conduct;
- dispute and complaint resolution;
- enforcing our rights, including debt collection and (where necessary) legal proceedings;
- in circumstances permitted by the Privacy Act and Credit Reporting Code; and
- complying with relevant legal and regulatory requirements.

If you lodge an enquiry or complaint, we will use the information you provide to respond to the issue.

Disclosure to your supervisor and Commanding Officer

When you apply for a loan or grant, this information (including any supporting documentation) will be sent automatically to your supervisor and Commanding Officer for endorsement. Once endorsed, your loan application and all supporting documentation will be provided to the ARTF team to process. Further information about the loan process can be accessed from our website (<http://www.armyrtf.com.au>).

Information about your financial situation may be disclosed to your Commanding Officer if and when the ARTF considers it is warranted in the following circumstances:

- you become bankrupt or insolvent; or
- the Trustees of the ARTF assess that you are experiencing serious financial hardship that is likely to have an impact on your welfare or the performance of your duties as a member of the Australian Army (including where your partner or dependent subsequently makes an application for a hardship grant).

Disclosure to other third parties

We may disclose personal information to third parties for the purposes described above, in accordance with the Privacy Act. Other third parties to whom we may disclose your personal information include:

- the Department of Defence to verify your identity and obtain employment information relevant to the assessment of your application;
- government regulatory bodies in Australia; and
- your administrator if you declare bankruptcy or enter into a debt or insolvency agreement.

Disclosure of credit information

Where permitted by the Privacy Act and Credit Reporting Code, your credit information may be disclosed (as necessary) in the circumstances described above.

6. How we hold and protect your personal information

The security of your personal information is important to us. We take reasonable steps to protect your information from misuse, interference and loss and also from unauthorised access, modification or disclosure.

We hold information in paper and electronic form. The measures we take to secure personal information include:

- using lockable storage cabinets;
- security measures to control access to our systems and premises;
- only disclosing information to persons who have a business need to know;
- assigning access to files in accordance with duties;
- ensuring our staff are trained to understand their privacy obligations;
- ensuring the correct security classification is applied to information and documents we hold; and only disclosing those documents in a manner that is in accordance with that classification.

We will only keep your information for as long as is necessary for business and legal compliance purposes. Subject to any legal obligations, we will take reasonable steps to destroy or de-identify personal information that is no longer required.

7. Access and correction and complaints

You have the right to request access to the personal information (including credit-related information) we hold about you, or seek correction of that information if you consider it to be incorrect or out of date. There is no charge for making a request. Under the Privacy Act, we may refuse an access or correction request in certain circumstances. We will notify you if this occurs and advise you of what next steps you can take.

You can make an access or correction request by contacting us via any of the methods listed below. We may ask you to provide information to verify your identity before your request is processed.

8. Complaints

You have the right to make a complaint if you consider that we have not complied with our obligations under the Privacy Act or the Credit Reporting Code. When making a complaint, please ensure you provide as much detail as possible to allow us to investigate the complaint and provide you a response.

You can make a complaint by contacting us via the email address listed below.

We will acknowledge your complaint within 7 days of receipt, and will endeavour to provide a response within 30 days. We will notify you if we need further time to investigate and resolve the complaint.

If you do not receive a response from us, or you are not satisfied with the outcome, you may lodge a complaint directly with the Office of the Australian Information Commissioner (see <http://www.oaic.gov.au> for further information).

9. Contact us

If you have any queries or complaints about our handling of your personal information, you can contact us via Email: AHQ.ARTF@defence.gov.au.