

National Affordable Housing Consortium Ltd
(ABN: 30 132 604 552)

National Affordable Housing Consortium Group Privacy Policy

To preserve the confidentiality of all information that individuals provide to the National Affordable Housing Consortium ('NAHC') Group of companies ('NAHC Group'), the NAHC Group has adopted the following policy with respect to privacy ('Privacy Policy'). In providing its services, NAHC Group is bound by the Privacy Act 1988 (Cth) ('the Privacy Act') and abides by the Australian Privacy Principles ('APPs') established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012. This Privacy Policy ('Policy') is intended to accord with those enactments and a summary of the Australian Privacy Principles is available by contacting our office.

NAHC Group may, from time to time, review and update this Policy to take account of new laws and technology, changes to NAHC Group's operations and practices and to make sure it remains appropriate to changes in relevant legislation.

Definitions:

- 'Owner' refers to the owner or prospective owner of an NRAS property administered by NAHC Group;
- 'Tenant' refers to the tenant or prospective tenant of a property administered by NAHC Group, whether the tenant's dwelling is managed by NAHC Group or a third party property manager engaged by NAHC Group to provide property management services ('Third Party NAHC Group Property Manager'). For purposes of this Policy, the term 'Tenant' refers to all individuals in the primary Tenant's household;
- 'Government' refers to:
 - a) a government (including Commonwealth, State and Local Governments) or government department (including the Department) or other body;
 - b) a government, semi-governmental or judicial person; or
 - c) a person (whether autonomous or not) who is charged with the administration of a law (including the Secretary);and includes means any government, administrative, fiscal or judicial body, department, commission, authority, tribunal, agency, Minister, statutory body or entity having jurisdiction in relation to the NRAS as the case may require; and
- 'NAHC Group' refers to the NAHC and its wholly owned subsidiaries which have resolved to adopt this Privacy Policy:
 - a) Home Equity and Rentals Services (ACN 607 324 792) (**HERS**)
 - b) HERS Property (ACN 630 088 238) (**HERSP**)
 - c) National Affordable Housing Consortium – Victoria (ACN 637 534 617) (**NAHCV**)
 - d) Sustainable Living Infrastructure Consortium (ACN 612 098 585) (**SLIC**)

What kinds of Personal Information does NAHC Group collect?

Under the Privacy Act and APPs, "Personal Information" is information or an opinion about an individual, or information or an opinion that may reasonably identify an individual, whether or not the opinion is true or not and whether or not the information is stored in material form or not.

NAHC Group only collects Personal Information that it is reasonably necessary for one or more of NAHC Group's functions or activities. NAHC Group collects Personal Information from and about:

- a. Owners;
- b. Tenants; and
- c. Job applicants and contractors.

a. Owners:

NAHC Group may collect the following Personal Information from and about an Owner:

- Name
- Contact details
- Address and/or lot number of NRAS investment property
- Bank account information
- Mortgagee/Lender associated with NRAS Property
- Purchase Contract for purchase of NRAS investment property
- NRAS property Insurance coverage information

b. Tenants:

NAHC Group may collect the following Personal Information from and about a Tenant:

- Name
- NRAS number and proof of NRAS approval
- Contact details
- Proof of identity
- Bank statement, credit card statement
- Occupation
- Education status
- Government pensions, allowances, assistance
- Proof of residence and/or citizenship
- Proof of rental history and documents related to rental history
- Proof/statements of income
- Demographic information (including household size and composition, ethnic or racial origin and health/disability status)
- Proof of employment, employment history,
- Personal and professional references
- Photographs of the interior and exterior of tenant dwellings, which may include pictures of tenant possessions.

c. Job Applicants and Contractors

NAHC Group may collect the following Personal Information from and about a job applicant or contractor:

- Name
- Contact details
- Relevant licenses
- Insurance coverage information
- Required Workplace Health and Safety documentation
- Resume
- Former/current employers and other references
- Current vehicle registration certificate

d. Option of Anonymity or use of Pseudonym:

Note that an individual may choose to deal with NAHC Group anonymously or under a pseudonym where lawful and practicable, provided NAHC Group is still able to provide the relevant service or do business with the individual without that information.

For example, it might not be practical to deal with an individual anonymously if NAHC Group needs to process a payment or send personalised communications to that individual.

How does NAHC Group collect the Personal Information?

a. Owners:

Where possible, NAHC Group will collect Personal Information directly from an Owner. This will usually be when an Owner submits the NAHC Group Deed Poll/Expression of Interest and Investor Authorisation and Information Form (formerly Owner Authorisation Form), as well as through agreements, correspondence (including emails), surveys and through verbal communications. However, NAHC Group may also collect information about an Owner from other persons including: financial institutions (including Owner's mortgagee), the builder/developer of an Owner's NRAS dwelling, property sales agents, insurance companies, property valuation firms, property managers, solicitors, and tradespeople that conduct work on an Owner's NRAS property.

b. Tenants:

NAHC Group will collect Personal Information directly from a Tenant, through on-site visits of tenant dwellings, and from third parties. Collection will occur when a Tenant applies to rent a property that NAHC Group manages or at lease renewal. Collection will also occur at various times throughout a tenancy, through demographic forms and questionnaires, registration books at open inspections, appointment forms, condition/entry report forms, agreements, correspondence (including emails), surveys and through verbal communications.

Where NAHC Group is not the property manager, NAHC Group also collects a Tenant's Personal Information (as set forth above) from a Tenant's Third Party NAHC Group Property Manager.

If you have applied for social housing under the Victorian Housing Register, then NAHC Group companies, where they are a Registered Housing Provider, can access your personal information that has been collected by other Victorian Housing Register agencies that you have dealt with.

NAHC Group may also collect information about a Tenant from:

- Tenant's current/former property manager(s)
- Personal and employer references provided by the Tenant
- Government
- Past/current employer of the Tenant
- Tenancy databases
- Courts
- Tenancy tribunals
- Rental bond authorities
- Insurers
- Debt collection agencies
- On-site inspections which may or may not include taking photographs of the tenant's dwelling.

c. Job Applicants and Contractors:

NAHC Group will collect Personal Information directly from a job applicant. This will usually occur when a job applicant submits his/her resume, job application and supporting material. NAHC Group may also seek information from third parties, including the personal and professional references that a job applicant provides, prior employers, or the applicant's placement agency (where applicable).

NAHC Group will collect Personal Information directly from a contractor. This will usually occur when a contractor provides NAHC Group with materials in response to NAHC Group's request for services.

NAHC Group may also seek information from third parties, including the personal and professional references that a contractor provides, trade organisations, insurance company, certifier, other individuals in the industry or from prior employers/principals.

Surveys:

NAHC Group considers surveys of Owners and Tenants (and their thoughts, opinions, perspectives, experiences and certain Personal Information) to be an important part of planning, development and research. Therefore, NAHC Group or a third party that NAHC Group has partnered with or contracted with may from time to time send surveys to Owners and Tenants. If an Owner or Tenant does not wish to receive surveys from NAHC Group (or a third party that NAHC Group has partnered with or contracted with) or does not wish his/her Personal Information to be used for such purposes, the Owner or Tenant may request exclusion from these activities by contacting NAHC Group's Privacy Officer using the contact details provided at the end of this Policy notice.

Receipt of Unsolicited Personal Information:

In the event that NAHC Group receives unsolicited Personal Information about or from an Owner or a Tenant, NAHC Group will determine within a reasonable period after its receipt whether or not NAHC Group could have collected such Personal Information under the Australian Privacy Principles. If NAHC Group determines that it could not have collected such Personal Information under the Australian Privacy Principles, then NAHC Group will as soon as practicable either destroy the Personal Information or otherwise ensure it is de-identified, provided that it is lawful to do so. Examples of exceptions include where collection of sensitive information is necessary to lessen or prevent a serious threat to someone's life, health or safety; or where the sensitive information relates to an Owner, Tenant, resident or visitor at one of our properties and is necessary for us to carry out our functions as property managers and administrators. Otherwise, NAHC Group will hold, use and disclose such Personal Information in accordance with this policy.

How will NAHC Group use the Personal Information Provided?

a. Owners:

NAHC Group will collect, hold and use the Personal Information about Owners for the following primary purposes:

- To enter into any transactions with Owners or on their behalf
- For any purpose related to the provision of a service to Owners (either by NAHC Group or a third party) and carrying out associated payments, administration and services
- To maintain, facilitate, improve and administer NAHC Group's services to Owners and Tenants
- To gather and aggregate information for statistical, reporting and research purposes
- To respond to requests for information by Government
- To get a better understanding of Owners, Owners' needs, and how Owners interact with NAHC Group/NRAS/Third parties, so NAHC Group can engage in research, development and business strategy, including managing the delivery of services by NAHC Group and others.

NAHC Group will also use the Personal Information for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by Owners, or to which Owners have consented. Secondary purposes include improving NAHC Group's services, conducting research, contacting Owners, and internal auditing and administration.

b. Tenants:

NAHC Group will use Personal Information it collects from Tenants for the following primary purposes:

- To enable Government and NAHC Group to assess a Tenant's eligibility to lease an NRAS property or other housing support and to provide additional information for assessing the rental program

- To match you with suitable housing
- To assess the risk of providing the Tenant with the tenancy,
- To process tenancy applications,
- To prepare leases or tenancy agreements
- To calculate and collect rental payments
- To maintain, facilitate, improve and administer NAHC's services to Owners and Tenants
- Get a better understanding of Tenants, Tenants' needs, and how Tenants interact with NAHC Group/NRAS/Third parties, so NAHC Group can engage in research, development and business strategy, including managing the delivery of services by NAHC Group and others.

If you have a current Victorian Housing Register application for social housing or are making an application to the Victorian Housing Register, the Housing Act 1983 (Vic) allows us to use and disclose your (and your household's) personal information to participating agencies for certain purposes, including to:

- determine whether you are eligible for social housing
- determine whether you are eligible for priority housing
- determine whether to allocate a tenancy in social housing to you
- determine your health, safety and support needs and housing requirements
- support you to access housing that is appropriate to your needs.

NAHC Group will also use the Personal Information for such other secondary purposes (in circumstances permitted under the Privacy Act and other relevant privacy legislation) that are related to the primary purpose of collection and reasonably expected by Tenants, or to which Tenants have consented. Secondary purposes include improving NAHC Group's services, conducting research, contacting Tenants, and internal auditing and administration.

c. Job applicants and contractors:

In relation to Personal Information of job applicants and contractors, NAHC Group's primary purpose of collection is to assess and (if successful) to engage the applicant or contractor, as the case may be.

Collection, use and disclosure of personal information for marketing

We may use the personal information collected from you for the purpose of providing you with direct marketing material for other products and services that may be of interest to you. However you may request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

Who might NAHC Group disclose Personal Information to?

Like most business organisations, NAHC Group contracts out some functions and relies on third party suppliers (including Third Party NAHC Group Property Managers) to conduct specialised activities. Whilst Personal Information may be provided to these contractors and suppliers in order to enable them to perform the agreed tasks, NAHC Group will require all such suppliers/contractors to provide an undertaking by which the supplier/contractor undertakes to abide by the Privacy Act and Australian Privacy Principles and other relevant privacy legislation use Personal Information only for the specific purpose for which it was disclosed.

a. Owners:

NAHC Group may disclose the Personal Information of Owners to:

- Government, including those departments administering NRAS
- Third Party NAHC Group Property Manager of the Owner's NRAS dwelling

- Entities providing services to NAHC Group
- Insurance providers
- Property valuers
- NAHC Group's solicitors and accountants
- The developer/builder of the Owner's NRAS property
- Tradespersons undertaking work on the Owner's NRAS property
- Entities that promote the rental of the Owner's property in the market
- Anyone the Owner authorises NAHC Group to disclose information to
- Anyone to whom NAHC Group is required to disclose the information to by law.

b. Tenants:

NAHC Group may disclose the Personal Information of Tenants to:

- Government, including those departments administering NRAS and the Victorian Housing Register
- The property owner, its lawyers and contractors
- Third Party NAHC Group Property Manager of the NRAS or Victorian Housing Register dwelling
- Trades people and other service providers
- Rental bond authorities and insurance providers
- Tenancy tribunals and courts
- Tenancy database operators and mercantile agents
- Referees the Tenant has nominated
- Anyone the Tenant has authorised NAHC Group to disclose information to
- Anyone to whom NAHC Group is required to disclose the information to by law.

c. Job Applicants and Contractors:

NAHC Group may disclose the Personal Information of job applicants and contractors to:

- Referees the job applicant or contractor have nominated
- Anyone the job applicant or contractor authorises NAHC Group to disclose the information to
- NAHC Group's solicitors and accountants
- The developer/builder of the Owner's NRAS property
- Anyone to whom NAHC Group is required to disclose the information to by law.

Sending information overseas:

NAHC Group may disclose Personal Information about an individual to overseas recipients. For instance, an owner of an NAHC Group dwelling may reside abroad in China, Indonesia, USA, South Africa or India. NAHC Group will not send Personal Information about an individual outside Australia without:

- Obtaining the consent of the individual (in some cases this consent will be implied); or
- Otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

How does NAHC Group Treat Sensitive Information?

'Sensitive Information' is defined under Australian Privacy Principle 6 and includes information relating to a person's health information or disability status, racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, sexual orientation, or criminal record. (Note that information from all of these categories may not be required.)

Certain Sensitive Information collected about a Tenant and the Tenant's household is requested by Government to ensure a Tenant's eligibility to rent a property under the National Rental Affordability Scheme or to determine a Tenant's charitable need under the Victorian Housing Register and to assist Government to find out who is accessing its services and to provide statistical data to Government departments that require us to report to them.

As a non-profit organization the NAHC Group may also collect Sensitive Information if:

- the information relates to the activities of the organisation, and
- the information relates solely to the members of the organisation, or to individuals who have regular contact with the organisation in connection with its activities.

NAHC Group is also required to comply with relevant State based health acts when NAHC Group collects and handles health information in various jurisdictions (refer to References to Standards and Legislation section at the end of this Policy).

Prior to collecting Sensitive Information, NAHC Group, other Third Party NAHC Group Property Managers and the Government will seek express consent from an individual to collect, use and handle that individual's Sensitive Information. Third Party NAHC Group Property Managers may disclose Sensitive Information to NAHC Group only for the purposes set out in relevant legislation. NAHC Group will only disclose Sensitive Information to the Government for the purposes set out in relevant legislation.

Information Sharing

Collection, use and disclosure of personal information between companies in the NAHC Group:

NAHC Group will share your personal information within the NAHC Group. If one NAHC Group company collects your personal information, other NAHC Group companies may use and disclose your personal information for the purposes described in the "How will NAHC Group use the Personal Information Provided?" section of this Policy.

NAHC Group will not disclose Sensitive Information amongst NAHC Group entities without prior express consent from the individual. The NAHC Group entity will then collect, use, store and disclose in accordance with relevant legislation.

Third Party Agencies:

Where an NAHC Group company is a participant in the Victorian Housing Register, personal information from applications and people wishing to transfer that is collect by the participating NAHC Group company, may be disclosed to the Victorian Housing Register or in some circumstances shared with other participating registered agencies of the Victorian Housing Register, consistent with legislative obligations and any obligations under a Participation Agreement (but NAHC Group will not disclose your personal information without your consent).

Management and Security of Personal Information

NAHC's staff and contractors are required to respect the confidentiality of Owners' and Tenants' Personal Information and the privacy of individuals.

NAHC Group has in place steps to protect the Personal Information NAHC holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods, including locked storage of paper records and password access rights to computerised records.

Collection through our Website

If the NAHC website allows you to make comments or give feedback, when you do this NAHC will collect your email address and sometimes other contact details. NAHC Group may use your email address to respond to your feedback. NAHC stores this personal information on servers located in Australia.

NAHC may use cookies and session tools to improve your experience when accessing the NAHC website. The information collected by any of these tools may include the IP address of the device you are using and information about sites that IP address has come from, the pages accessed on our site and the next site visited. NAHC uses the information to maintain, secure and improve our websites and to enhance your experience when using them.

Note: If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. There are also plugins available that allow users to opt-out from using cookies if they wish. Further details on the cookies and how the website uses them here:
https://docs.expressionengine.com/v2/add-ons/cookie_consent/index.html#standard-expressionengine-cookies. Be mindful that if you disable the cookie feature you may not be able to use our online transactions and services.

Access to and Correction of Personal Information

Under the Privacy Act and Australian Privacy Principles, an individual has the right to obtain access to Personal Information which NAHC Group holds about them and to advise NAHC Group of any perceived inaccuracy. There are some exceptions to these rights set out in the applicable legislation.

To make a request to access or update any Personal Information that NAHC Group holds about an individual, that individual should contact NAHC Group's Privacy Officer using the contact details provided at the end of this Policy notice. NAHC Group may require the individual to verify the individual's identity and specify what information the individual requires. NAHC Group may charge a fee to cover the cost of verifying the individual's application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, NAHC Group will advise the likely cost in advance. If NAHC Group cannot provide the individual with access to that information, NAHC Group will provide the individual with a written notice explaining the reasons for refusal.

Responding to Data Breaches

If NAHC Group has reasonable grounds to *believe that it has* experienced an eligible data breach, it will promptly notify individuals and the Commissioner about the breach, unless an exception applies.

If NAHC Group *suspects that it may* have experienced an eligible data breach, it will quickly assess the situation to decide whether or not there has been an eligible data breach. NAHC Group's assessment will be reasonable and expeditious, and NAHC Group has developed procedures for assessing a suspected data breach.

Enquiries and Complaints

If an individual would like further information about the way NAHC Group manages the Personal Information it holds or wishes to complain that NAHC Group has breached the Privacy Act or Australian Privacy Principles, the individual is asked to contact NAHC Group's Privacy Officer using the contact details provided at the end of this Policy notice. NAHC Group will investigate any complaint and will notify the individual of the making of a decision in relation to the complaint in a reasonable time after it has been made.

Additional information about privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

Contact NAHC Group

NAHC Group Privacy Officer
privacy@nahc.org.au
(07)3169-2500
PO Box 1690
MILTON QLD 4064

Last updated: March 2020