



Privacy Policy

Executive Summary

The Board, as the accountable authority of the NRFC, has a general obligation to establish and maintain appropriate systems of risk oversight, risk management and internal control – including to ensure compliance with the NRFC’s obligations under the Privacy Act 1988 (Cth) (**Privacy Act**), the Australian Privacy Principles (**APP**) and the Australian Government Agencies Privacy Code (**Code**).

This Policy sets out the Board’s expectations on how the NRFC will meet these obligations.

Version Control

Policy Owner:	Chief Risk Officer
Effective date:	July 2026
Next routine review:	July 2027

1. Introduction

1.1 Purpose

The National Reconstruction Fund Corporation ("**NRFC**", "**we**", "**our**" or "**us**") is bound by the Privacy Act, the APPs and the Code.

This Policy sets out the Board's expectations on how the NRFC will meet these obligations, including how the NRFC collects, holds, uses and discloses Personal Information

1.2 Definitions

Personal Information, as defined in the Privacy Act, means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information 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, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practice, or criminal record;
- health information;
- genetic information, and
- biometric information.

2. Collection

2.1 What information we collect

The types of Personal Information we may collect and hold depends on our relationship and interactions with you. This could include (but is not necessarily limited to):

- identifying information such as name, address, date of birth, gender, signature and identification documentation;
- personal and business contact details;
- information about your interactions with us, such as inquiries, consultation, complaints and applications (including applications under the *Freedom of Information Act 1982* (Cth) (**FOI Act**)) you have made, and payments we have administered;
- information about your circumstances, such as current employment and work history, citizenship, education and qualifications, and financial situation/interests or other beneficial interests;

- banking, tax and superannuation details, including your tax file number (in accordance with the *Privacy (Tax File Number) Rule 2015*) and ABN if applicable;
- background / police checks;
- information about your authorised representatives, family members, alternative/emergency contacts, or other related persons;
- information about your current or former employment with the NRFC; and
- job applicant information (including referee details).

We may collect Sensitive Information with your consent, where authorised or required by law, or where this is otherwise allowed under the Privacy Act. For example, in relation to job applicants and employees, we may collect health information and (as part of police background screening checks) criminal record information.

2.2 AML/CTF obligations

The NRFC is subject to obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**) and associated rules.

We may collect, hold, use and disclose Personal Information to comply with our AML/CTF obligations, including for customer due diligence, ongoing monitoring, reporting and record-keeping purposes. If so, we will limit the collection of Personal Information to what is reasonably necessary to comply with our AML/CTF obligations and other functions and activities of the NRFC. This may include information required to verify your identity, assess money laundering or terrorism financing risk, and comply with reporting and record-keeping obligations.

2.3 How we collect Personal Information

We collect Personal Information in various ways, including through paper and electronic forms and documents, email, website, social media, face to face, and over the phone.

We will generally collect your Personal Information directly from you.

We may also collect your Personal Information from third parties with your consent, where authorised or required by law, or where this is otherwise allowed under the Privacy Act, including where this is necessary for AML/CTF purposes.

Third parties may include (but are not necessarily limited to) your authorised representatives, current or former employers, referees, contracted service providers, background screening providers, credit reporting bodies, law enforcement agencies and other Commonwealth, State and Territory government entities.

We may be restricted from notifying you about certain collections of Personal Information where doing so would be inconsistent with our legal obligations, including the prohibition against disclosing information that would or could reasonably be expected to prejudice an investigation under the AML/CTF Act (i.e. 'tipping off').

2.4 Online interactions

When you visit and use our website (www.nrf.gov.au), information about your activity may be collected using cookies, tracking pixels and similar technologies. Cookies are small files that store information on your computer, mobile phone or other device, and help us to optimise and improve online content and user experience. This information may include whether an email has been opened, links selected, device information and other usage information. We use this information to administer and improve our communications and services.

While we do not use information to personally identify you, we may record information about your use of our website, such as the pages you visit, the date and time of your visit, search engine referrals, the type of internet browser you use and your device's IP address.

You can disable cookies through your internet browser. However please note that if you choose to do so, this may affect the performance of our website.

The NRFC may use Mailchimp to send you newsletters or other communications. The information we collect may include your name, email, State or Territory you are based in, and priority areas you are interested in. This information may be used to support future content we share with you.

We also use social networking platforms such as LinkedIn, and YouTube amongst others. We may collect your Personal Information when you communicate with us via these platforms. The social networking services have their own privacy policies and may collect your Personal Information for their own purposes.

Our website may contain links to other websites external to the NRFC. Linked websites are outside of our control and are not covered by this Policy. We make no representations or warranties in relation to the privacy practices of any third party website owners or operators.

Links to external websites do not constitute an endorsement or recommendation of any material on those sites, or of any third party products or services offered by, from or through those sites.

3. Purposes for which we collect, hold, use and disclose Personal Information

3.1 General purposes

We collect, hold, use and disclose Personal Information when it is reasonably necessary to enable us to perform our functions and activities, which broadly include:

- administering our functions under the *National Reconstruction Fund Corporation Act 2023* (Cth) and complying with our legislative obligations;
- recruitment, employment and personnel management;
- managing and responding to inquiries, feedback, complaints and other requests;

- providing publications, information and other services requested by you;
- conducting our business as usual activities;
- enabling you to register to gain access to the NRFC's web tools and publications;
- resolving disputes and enforcing our agreements and rights with third parties, and
- complying with our AML/CTF obligations.

3.2 Subscription communications

We may use your Personal Information to identify and provide you information about products, services and events that may be of interest to you.

Communications may be sent by the NRFC (or its contracted service providers) in various forms including email, SMS, phone call or mail, in accordance with applicable laws governing these activities including the Privacy Act and *Spam Act 2003* (Cth).

We may use information collected through cookies, tracking pixels and similar technologies to improve our website, understand engagement with communications, administer subscriptions and develop future communications.

You can opt-out of receiving these communications from us at any time by using the opt-out mechanism provided in the subscription communications, or by contacting the NRFC Privacy Officer via the details provided further below.

3.3 AML/CTF use and disclosure

Where authorised or required by law, including the AML/CTF Act, we may use or disclose Personal Information (including Sensitive Information) without your consent. This includes disclosure to the Australian Transaction Reports and Analysis Centre (**AUSTRAC**) or other regulatory bodies. We will:

- not use or disclose Personal Information collected for AML/CTF purposes for other purposes unless permitted by the Privacy Act; and
- comply with any restrictions on use or disclosure of Personal Information under the AML/CTF Act, including secrecy provisions and prohibitions on 'tipping off'.

3.4 Other purposes

While we will generally only deal with your Personal Information for the primary purpose for which it was collected, we may need to use or disclose your Personal Information for a different purpose (i.e. a secondary purpose). Where this is required, we will only do so where we either have:

- your consent,
- where we are required or authorised by law or a court/tribunal order, or
- as otherwise allowed under the Privacy Act.

4. Disclosure

4.1 Third party disclosures

The kinds of third parties to whom we may disclose your Personal Information include but are not limited to:

- our contracted service providers who deliver services to us or perform services on our behalf;
- credit providers or credit reporting bodies (with your consent, or otherwise as permitted by the Privacy Act);
- your authorised representatives;
- law enforcement agencies and Commonwealth, State and Territory government entities;
- suppliers, business partners and service providers we engage for data processing, marketing and other administrative and support functions;
- in respect of internet protocol addresses collected via electronic signing platforms (e.g. DocuSign), the counterparties to the document being executed electronically by you;
- our professional advisers (for example, our insurers, auditors, lawyers and consultants), and
- AUSTRAC and other regulatory bodies where authorised or required by law.

4.2 Overseas disclosure

The NRFC may engage contracted service providers or business partners located overseas (or that use subcontractors outside Australia) for the purposes of:

- performing certain functions and activities on our behalf; or
- delivering services to us (for example, cloud storage).

The NRFC may disclose personal information to service providers located overseas, or to service providers that use infrastructure, affiliates or subcontractors located overseas. This includes technology platforms used to manage stakeholder communications and newsletter subscriptions, such as Mailchimp.

5. Security and storage

We store Personal Information in a range of hard copy and electronic forms. We take all reasonable and appropriate steps to protect your Personal Information against misuse, interference and loss, and from unauthorised access, modification or disclosure.

Where your Personal Information is no longer needed for our business purpose or any permitted purpose under the Privacy Act or APPs (including an AML/CTF

purpose) and is not required by law to be retained, we will take reasonable steps to destroy, delete or de-identify that information in a secure manner.

6. How to access and correct your information

6.1 Privacy Act

We will endeavour to ensure that the Personal Information we hold about you is up to date, accurate and complete. We may from time to time ask you to tell us of changes to your information.

You may make a written request for access to, or correction of, the Personal Information we hold about you at any time by contacting our Privacy Officer on the details provided below. We may need to verify your identity before processing your request.

We will respond to a request to access or correct your information within 30 calendar days. If we cannot respond to you within 30 calendar days, we will contact you and provide a reason for the delay and an expected timeframe for finalising your request.

We must give you access to or correct your Personal Information unless one of the exceptions under the Privacy Act applies. If a request is refused:

- we will provide you with reasons for the decision, and
- in the case of a refusal to correct Personal Information – you may request that we associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

We may refuse or limit access to Personal Information where authorised or required by law, including where providing access would be inconsistent with our AML/CTF obligations.

6.2 FOI Act

An alternative mechanism for requesting access to, or correction of, information we hold about you is to lodge a formal application under the *FOI Act*. For more information on how to lodge an application with the NRFC, please visit our website.

7. Privacy complaints

If you believe that we have breached our privacy obligations in relation to the handling of your Personal Information, you can make a complaint by contacting us on the details provided further below.

Your privacy complaint should be lodged in writing and include all relevant details to enable us to understand, assess and investigate the matter. Once your complaint is received, we will:

- acknowledge receipt as soon as possible, and
- investigate your complaint and provide you with a response within a reasonable timeframe (generally within 30 calendar days unless the matter is complex).

If you are not satisfied with how your complaint is handled by us, you may lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**). Further information about how to do this can be found on the OAIC website at www.oaic.gov.au.

8. Contacting us

If you wish to:

- submit a query or provide feedback in relation to this Policy
- make an inquiry about our privacy and Personal Information handling practices
- lodge an access or correction request in relation to your Personal Information, or
- lodge a privacy complaint,

please contact the NRFC's Privacy Officer by email on privacy@nrf.gov.au or by post addressed to the Privacy Officer, National Reconstruction Fund Corporation GPO Box 344, Sydney NSW 2000.

9. Review

The Chief Risk Officer is responsible for reviewing this Policy at least annually to ensure it remains fit for purpose and may make minor changes.

The Chief Executive Officer may amend this Policy provided the Board is notified of any material changes.

Any updated version of this Policy will be posted on our website and will be effective from the date of posting. You should bookmark and periodically review this page to ensure that you are familiar with the most current version of this Policy and so you are aware of the way we handle your information.