

Good Loans Programme - Privacy Statement

10 August 2020

1. Introduction

This Privacy Statement explains what happens to your personal information when you inquire about or participate in the Good Loans Programme (the "Programme"). This Privacy Statement applies in addition to Good Shepherd New Zealand's general privacy policy, which is available at www.goodshepherd.org.nz, and any privacy statement provided by your community provider and/or your loan provider.

2. We collect personal information

When you inquire about the Programme, the entity receiving your inquiry (usually your community provider or Good Shepherd New Zealand) will collect the information that you disclose to them in your inquiry. This will include at least your name and contact details but may also include other information like demographic data and how you intend to use the services provided by the Programme (which might be a financial conversation, loan, referral to other services or debt counselling) ("Programme services").

If you attend one or more interviews about a loan (whether in person, by telephone or otherwise), and if you apply to take part in the Programme, your community provider and the relevant loan provider will collect further information from you. This information will include pay slips and bank statements, evidence of your household expenses, details of your debts, proof of identification, details of how you intend to use the loan, anything else that you disclose to us in the interview and the information on your application form.

If your application is successful and you take out a loan, your community provider and loan provider will collect further information about you as they interact with you throughout the term of your loan (including your payment history and records of any further communications they have with you regarding the loan).

If at any stage you are referred to the DEBTSolve Programme, then your debt coach will also collect information about your finances and current debt.

In addition, if you later agree to participate in any detailed research or provide a client story, then we may collect further information from you as part of that. What we collect and how we will treat that information will be disclosed to you at the time, and we will ask your consent in advance of collecting this further information.

3. If we can't collect your information, we may not consider you for our Programme

Sometimes if we ask you to provide certain information, and you don't provide it, we may not be able to involve you in our Programme. We will explain this more to you at the time.

However, this does not apply to information we separately ask you to provide for research purposes or in connection with client stories – it is always completely optional as to whether you take part in those separate activities, and if you do not want to participate in that separate research or client story activity that will not affect your participation in the Programme.

4. Why we collect your personal information

Your personal information is collected in order to administer the Programme. This may include:

- a) Receiving and processing inquiries and (where applicable) transferring your inquiry or application to the appropriate community provider and/or loan provider;
- b) Considering your eligibility for a loan, including your financial position;
- c) Where you are involved in the DEBTSolve Programme, helping you to manage your debts, including negotiating with your creditors on your behalf (if you consent);
- d) Assisting you to complete and submit a loan application, and negotiating with the community provider and/or loan provider if necessary;
- e) Assessing your loan application;
- f) Providing and administering your loan, including monitoring and assisting you to manage your repayments, and conducting audits, monitoring and training;
- g) Handling complaints;
- h) Reporting between the parties involved in the Programme, including the relevant loan providers, debt coaches, community providers and Good Shepherd New Zealand, the Ministry of Social Development and other internal and external stakeholders;
- i) Carrying out research, assessment and analysis of our projects and initiatives (on the basis that your personal information will not be published in a manner that identifies you unless you expressly consent to it);
- j) Contacting you in relation to your use of our Programme services and requesting your consent to participate in further detailed research or client stories from time to time.

Good Shepherd New Zealand, your loan provider and your community provider also conduct research, evaluation and statistical analysis relating to the Programme. Generally, your personal information will be de-identified before any research is published. If we want to publish any research or other information that identifies you, Good Shepherd New Zealand or your community provider will get in touch with you and ask your permission first.

5. How your personal information is used

Your personal information is used to carry out the above purposes of collection (paragraph 4). Your personal information may only be used for another purpose if permitted under applicable privacy law, or with your consent.

6. Who your personal information is disclosed to

Generally, your personal information is only disclosed where this is to carry out the purpose of collection (paragraph 4), or where permitted by applicable privacy law.

However:

- a) If you make an inquiry to Good Shepherd New Zealand about using our Programme services, Good Shepherd New Zealand may pass your information on to the appropriate debt coach, community provider and/or loan provider;
- b) Your information may be transferred between loan workers, debt coaches and community providers, for example if we need to transfer your loan from one provider to another, or if we transfer you between a NLS or StepUP Loan Programme and the DEBTsolve Programme;
- c) If you apply for a loan under the StepUP Loan Programme, your application will be passed to the Bank of New Zealand, which administers the StepUP loan (and the Bank of New Zealand will treat your information in accordance with its own privacy policy);
- d) Records relating to your use of our Programme services may be stored on central files or a central database administered by Good Shepherd New Zealand, your community provider and/or your loan provider, Good Shepherd New Zealand, your community provider and/or your loan provider may access your personal information (including information held on these databases), and may use it for audit and monitoring purposes, to provide technical support and training to the relevant loan provider and/or your community provider, to generate de-identified reports for research, evaluation and analysis, and to help improve the Programme;
- e) Good Shepherd New Zealand, your loan provider, and your community provider will exchange information about your use of our Programme services and (if you take out a loan) your loan, including in relation to your credit history, capacity, standing and general creditworthiness. Those parties will also exchange information about how you pay off your loan (including your relevant balance(s)) and your loan management generally;
- f) Loan providers and community providers will tell Good Shepherd New Zealand if they receive a complaint about your use of our Programme services and may involve Good Shepherd New Zealand in the complaints handling and resolution process. Similarly, if Good Shepherd New Zealand receives a complaint relating to your use of our Programme services, it may forward that complaint on to the relevant loan provider or community provider;
- g) If you have a loan outstanding, this fact may be disclosed to other loan providers and/or community providers if you apply for another Good Shepherd loan through them;
- h) We may share personal information with the third-party partners that we conduct research with. This includes organisations like the Ministry of Social Development and Statistics NZ, who may supplement, match and check our information. We only do this for the purpose of the research, and to evaluate the success and outcomes of the Programme. The research published will not identify you personally unless you expressly consent to it;
- i) We also need to report information to the Ministry of Social Development and other funding providers in order to obtain funding from them. This is for the purpose of allowing the Ministry and other funding providers to track and assess the outcomes of the programmes that they fund. Any information we give to the Ministry and/or other funding providers for this purpose will not identify you in any way and will only be used for analysis, evaluation, reporting and research purposes.

In addition:

- j) Your personal information may be disclosed where required or permitted by applicable law;
- k) Good Shepherd New Zealand may share information with their service providers and related entities (and vice versa) in connection with carrying out the purposes explained above;
- l) If the NILS Programme or your loan is transferred to a third party your personal information may be shared with that third party;
- m) Some central databases used as part of the Programme are hosted overseas (e.g. in Australia) and your personal information may be transferred and stored overseas as part of this.

7. Retention and security of personal information

Your information will be protected by reasonable security safeguards against loss, unauthorised access, use, modification, disclosure, and other misuse. Your information will not be kept for longer than permitted by applicable law.

8. Electronic Disclosure

Good Shepherd New Zealand, your community provider, or your loan provider may send you notices and communications in relation our Programme services in electronic form and by electronic communication.

9. You have rights of access and correction

Under the New Zealand Privacy Act, you have certain rights to access personal information held about you, and to correct it if it is wrong. To request access to or correction of your personal information held by Good Shepherd New Zealand, please contact us on the contact details below:

Good Shepherd New Zealand Limited
Level 7
2 Kitchener Street
Auckland Central
Auckland 1010
microfinance@goodshepherd.org.nz

10. Glossary

In this Privacy Statement:

"Good Loans Programme" includes NILS (No Interest Loan Scheme), the StepUP Loan Programme and the DEBTsolve Programme

"Good Shepherd New Zealand" or **"we"/"us"** means Good Shepherd New Zealand Limited and includes its (directly or indirectly) related entities in New Zealand and Australia;

"community provider" means a community organisation that you talk to regarding a Programme, for example The Salvation Army. Sometimes we provide the same services as a community provider, so your provider may actually be Good Shepherd New Zealand or one of our related entities;

"loan provider" means the organisation that funds your loan. If you take out a NILS loan, your loan provider is both your community provider, and the bank that provides your community provider with loan funding. If you take out a StepUP loan, your loan provider will be the Bank of New Zealand.