



## **Good Loans Privacy Statement**

#### 1. Introduction

This Privacy Statement explains what happens to your personal information when you enquire about or participate in the <u>Good Loans</u> programme.

This Privacy Statement applies in addition to <u>Good Shepherd New Zealand's general privacy policy</u> and any privacy statement provided by your community provider, your loan provider and/or your loan funding provider.

## 2. We collect personal information

When you enquire about the programme, the entity receiving your enquiry (usually your community provider or Good Shepherd New Zealand) will collect the information that you disclose to them in your enquiry.

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 – this might be a financial conversation, loan, debt solution or referral to other 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/or loan provider will collect further information from you.

This information will include payslips 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/or loan provider will collect further information about you as they interact with you throughout the term of your loan – this includes 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 Good Loans coach or financial wellbeing advocate 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 for 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 further 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 enquiries and (where applicable) transferring your enquiry or application to the appropriate community provider and/or loan provider;
- b)Considering your eligibility for a loan, including identifying you and understanding 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, including your willingness and capacity to repay and credit history, and the review of any assessment recommendation by your loan funding provider;
- 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, loan funding providers, Good Loans Coaches, financial wellbeing advocates, community providers, 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 – this is 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 community provider, your loan provider and/or your loan funding 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 contact 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 enquiry to Good Shepherd New Zealand about using our programme services, Good Shepherd New Zealand may pass your information on to the appropriate Good Loans coach, financial wellbeing advocate, community provider and/or loan provider;

- b) Your information may be transferred between Good Loans coaches, financial wellbeing advocates and community providers. For example, if we need to transfer your loan from one community provider to another, or if we transfer you between the Good Loans programme and the DEBTsolve programme;
- 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, your loan provider and/or your loan funding provider. Good Shepherd New Zealand, your community provider , your loan provider and/or your loan funding 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 community provider, loan provider and/or loan funding provider, to generate de-identified reports for research, evaluation and analysis, and to help improve the programme;
- e) Good Shepherd New Zealand, your community provider, your loan provider, and/or your loan funding provider will exchange information about your use of our programme services and (if you apply for 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 balances) and your loan management generally; At times, we may disclose information about you to credit reporting agencies, debt collection agencies or law firms as part of our debt recovery process;
- f) Community providers, loan providers and/or loan funding providers will tell Good Shepherd New Zealand if they receive a complaint from you about 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 from you about our Programme services, it may forward that complaint on to the relevant community provider, loan provider and/or loan funding provider;
- g) If you have a loan outstanding, this fact may be disclosed to other community providers, loan providers and/or loan funding providers if you apply for another Good 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 our loan funding providers, the Ministry of Social Development and other funding providers in order to obtain funding from them. This is for the purpose of allowing the loan funding providers, Ministry and other funding providers to track and assess the outcomes of the programmes that they fund. Any information we give to the loan funding providers, 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) You may be asked to share your personal information with another organisation as part of your involvement with our programme. An example is for ID verification or to get a credit report or your bank transaction information. We will inform you before this happens and you will be asked to provide your consent before your information is provided to them;
- k) Your personal information may be disclosed where required or permitted by applicable law;
- I) 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;
- m) If the Good Loans programme or your loan is transferred to a third party your personal information may be shared with that third party;
- n) 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 misuses. Your information will not be kept for longer than permitted by applicable law.

#### 8. Electronic Disclosure

Good Shepherd New Zealand, your community provider and/or your loan provider may send you notices and communications in relation to 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 PO Box 49 Wellington 6140

Telephone 0800 466 370 support@goodshepherd.org.nz

## 10. Glossary

In this Privacy Statement:

**Good Loans programme** includes NILS (No Interest Loan Scheme), Good Loans 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 or other organisation that you talk to regarding a programme. 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 Good Loan, your loan provider is either Good Shepherd New Zealand or your community provider;

**Loan funding provider** means the bank that provides Good Shepherd New Zealand, your community provider and/or your loan provider with loan funding.