

# Small Business Relief Fund

## Grant Program Privacy Policy

Boa

Effective as of 1 May 2020

COSBOA (“**COSBOA**,” “**we**,” “**us**” or “**our**”) manages certain grant programs (the “**Grant Programs**”) on behalf of third-party grant providers (the “**Grant Provider**”) to support eligible small businesses who need assistance due to the economic effects of the new coronavirus disease (COVID-19). This “**Privacy Policy**” describes the privacy practices of COSBOA in connection with the Grant Program, including any information or documentation provided in connection with the Grant Program, which may be collected by COSBOA, (collectively, the “**Service**”). This Privacy Policy describes the rights and choices available to individuals with respect to their information.

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## Personal Information We Collect

**Information you provide to us.** Personal information you provide to us through the Service or otherwise includes:

**Contact data**, such as your first and last name, email and mailing addresses, phone number.

**Registration data**, such as your username and password that you may set to establish an online account with us, and any content, text and images, along with the metadata associated with the files you upload.

**Communications**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us.

**Applicant data**, such as your characteristics (e.g., race, gender (including gender pronoun), and sexual orientation) and any additional applicant provided information (e.g., business plans, pitch decks, use of proceeds plans, or relevant social media account information, if applicable).

**Financial data**, such as your stated income, economic standing, information about your financial assets and liabilities, employment history and other information necessary to perform a background check or determine your eligibility.

**Identity data**, such as a national identification number (e.g., tax identification number, and employer identification number).

**Other information about you** that you may provide which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

#### **Cookies and Other Information Collected by Automated Means**

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Service, including but not limited to, your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing our website, general location information such as city, state or geographic area; information about your use of and actions on the Service, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access; and other personal information. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

## How We Use Your Personal Information

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

**Service delivery.** COSBOA uses your personal information to:

- provide, operate and improve the Service;
- provide information about the Grant Program;
- help us verify your identity and perform a background check;
- communicate with you during and after the approval process;
- review and render decisions regarding your Grant Program application;
- service your grant award over time in connection with the Grant Program;
- establish and maintain your account on the Service;
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages; and
- to respond to your requests, questions and feedback.

**Research and development.** COSBOA collects information regarding your use of the Service for internal use to analyse and improve the Service, including by studying user demographics and use of the Service.

**To comply with law.** COSBOA uses your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to:

- (a) respond to requests from government authorities;
- (b) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- (c) enforce the terms and conditions that govern the Service; and
- (e) protect, investigate and deter against fraudulent, harmful, unauthorised, unethical or illegal activity.

**With your consent.** In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

**To create anonymous, aggregated or de-identified data.** We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that would reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyse and improve the Service and promote our business.

**For other purposes.** We may also use your personal information for other purposes described in this Privacy Policy or at the time we collect the information.

## How We Share Your Personal Information

We do not share your personal information with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

**Affiliates.** We may share your personal information with our affiliates and Grant Providers, for purposes consistent with this Privacy Policy.

**Business transfers.** We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganisation or sale of assets, or in the event of bankruptcy or dissolution.

**Judges.** We may share your information with volunteer judges to help us administer, evaluate applicants' ability to qualify for, judge your application for, and/or otherwise carry out any aspect of the Grant Program.

**Service providers.** We may share your personal information with third-party companies and individuals that provide services on our behalf or help us operate the Service. For example, we may share your personal information with third parties like SurveyMonkey to host the application process, or other third parties to facilitate the background check and tax preparation, or to fulfil payment of the grants. These third parties may use your personal information only as directed or authorised by us and in a manner consistent

with this Privacy Policy and are prohibited from using or disclosing your information for any other purpose.

**Professional advisors.** We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.

**For compliance, fraud prevention and safety.** We may share your personal information for the compliance, fraud prevention and safety purposes described above.

## Your Choices

In this section, we describe the rights and choices available to all users.

**Access or update your personal information.** If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

**Cookies.** We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Service and third-party websites. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

**Do Not Track.** Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

**Choosing not to share your personal information.** Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our Services. We will tell you what information you must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

## Other Sites, Applications and Services

The Service may contain links to other websites, applications, and other online services operated by third parties. In addition, our content may be included on web pages or in applications or online services that are not associated with us. We do not control third party websites, applications or online services, and we are not responsible for their actions. Other websites, applications and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites, applications and online services you use.

## Security Practices

The security of your personal information is important to us. We implement and maintain several organisational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

## International Data Transfers

We are headquartered in Canberra, Australia and your personal information may be transferred to the United States, or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country.

## Children

Children under 18 are not permitted to use the Service, and we do not knowingly collect personal information of a child under 18. If we learn that we have collected personal information of a child under 18, we will delete it. If you have reason to believe that a child under the age of 18 has provided us with information about themselves, please contact us as described below.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. We may, and if required by law will, also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Service.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Service (or as otherwise indicated at the time of posting). In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

## How to Contact Us

Please direct any questions or comments about this Policy or privacy practices to [info@cosboa.org.au](mailto:info@cosboa.org.au). You may also write to us via postal mail at: Secretariat: PO Box 576 Crows Nest NSW 1585, or phone (02) 9431 8646 during normal working hours.