



The Hearing House

Privacy Policy Statement

Introduction

This privacy policy explains how The Hearing House (referred to as “us”, “our” or “we”), collects, stores, uses and shares your or your child’s personal information (child refers to children under 16 only).

It is our intention to have open and transparent policies in respect of our privacy practices. The Privacy Act 2020 and the Health Information Privacy Code 2020, requires us to explain our privacy practices to you and we want to let you know why you can trust us to handle your information or your child’s information with the upmost respect and care.

This policy will explain what personal information we collect, how we use that information and/or share that information. It will also explain how we store and protect your or your child’s personal information and what rights you have to access the information we hold and request for it to be corrected.

The key points of our policy are summarised below:

- We only collect personal information necessary to enable us to carry out our functions (e.g. audiological services (hearing aids/ cochlear implants), therapy services, fundraising, health and statistical research, marketing and communication functions)
- We collect personal information about you or your child either directly from you or from other people or agencies (e.g. GP, local district health board), including referees that you authorise us to collect your information from
- As we carry out our functions we may generate personal information about you or your child
- We store our data (which includes personal information about you or your child) on secure local servers, a cloud based content management system and in individual medical files that are kept securely on our premises. We protect our data with all reasonable technical and process controls
- You can ask us for a copy of your or your child’s personal information at any time. We aim to be as open as we can while still ensuring we meet our privacy obligations
- We are only able to use and share personal information where necessary to carry out our functions or if the law requires us to do so.

If this policy does not answer any questions, or concerns you may have relating to how we are managing your or your child’s personal information, please do not hesitate to contact us.

The privacy policy will be updated when required to reflect any changes in legislation. This version of the policy is from March 2023.



Information collection, use and sharing.

To be able to provide appropriate audiology and therapy services to you or your child we are required to collect significant amounts of sometimes sensitive information. We would also collect information if you donate to us or participate in fundraising and/or communication initiatives including Loud Shirt Day.

Collecting information from you directly

The majority of the information we collect is provided directly by you or your authorised representative. This starts when you enquire or enrol in our services and continues during your appointments.

You do not have to provide your or your child's personal information to us. However, we may not be able to effectively provide you with our services (such as audiology services), if you do not provide us with the information we need.

The personal information we may collect from you directly includes:

- Your name and/ or your child's name
- Your contact details, including your address, email address and phone number
- Your or your child's NHI number
- Information about your authorised representative (if applicable)
- Information about your or your child's eligibility to receive publically funded health services (if applicable)
- Your consent to participate in marketing/ fundraising or research
- Your or your child's responses to questionnaires/ standardised assessment/ audiological testing, including demographic information we collect for research purposes.
- Your responses to satisfaction surveys we ask you to complete (with the option to complete these anonymously)

Some of the personal information that we collect may be requested by the Ministry of Health to assist with auditing, reporting and statistical purposes.

Collecting information from another person or agency

In order to provide effective an appropriate audiological or therapy services to you or your child, we are required to obtain information from other agencies. Often this is provided by other agencies in the form of a referral to us for which they have already obtained consent from you, or where you have provided their information to us and consented to us collecting your information from the other agencies.

We may collect personal information from the following people or agencies:

- General practitioners
- Departments within Te Whatu Ora – Health New Zealand (including Audiology, Ear Nose and Throat, Genetics, Radiology, Paediatric records)
- Ministry of Education
- Ministry of Health
- Ko Taku Reo



- Hearing Life
- Hearing Aid and Cochlear Implant manufacturers (e.g. Phonak, Cochlear Limited)
- Immigration NZ (to establish you are a legal resident)
- Accident Compensation Corporation (ACC)
- Oranga Tamariki (Ministry for Children)
- Anyone else for which you have provided consent for us to collect from.

Information generated by us as we provide services

In the course of providing services to you or your child we generate personal information. This could include:

- Clinic notes
- Correspondence (this may include letters and emails) including between our staff or with staff of other agencies
- Assessment and progress reports and testing results

What we do with your personal information

In order to provide appropriate services to you or your child we need to use your or your child's personal information in the ways listed below. If we use the information in ways not anticipated, we would only do so in compliance with the Privacy Act 2020 and The Health Information Privacy Code 2020.

We will use personal information to:

- Make a determination as to the most effective assistive listening device for you or your child (e.g. hearing aid/ cochlear implant) and make recommendations to our funder, the Northern Cochlear Implant Trust ("NCIT") or to other funding agencies (such as ACC or private insurance companies)
- Monitor your or your child's progress using the assistive listening device. This could include using information contained in audiograms, speech testing and/or standardised language assessments
- Developing long and short terms goals for your child
- Developing a rehabilitation plan (Adults only)
- Review and improve the delivery of our services, including conducting satisfaction surveys
- Conduct internal statistical analysis and meet our reporting requirements (such as to the Ministry of Health)
- As detailed in the "The Hearing House Research Database" section of this privacy policy below, conduct health and statistical research provided appropriate consent has been given by you on our consent form. Research data is de-identified prior to dissemination of results.
- Conduct marketing or fundraising campaigns such as Loud Shirt Day. This may also include information being shared on social media, providing appropriate consent has been sought and given

We share your or your child's personal information where necessary to provide appropriate services to you or your child or for research purposes. We will have obtained the appropriate informed consent from you to share this information or we may be legally required to share the information such as when there is an immediate concern for your or your child's safety. We may, for example, share personal information with:



- Funding agencies who fund cochlear implantation or hearing aids or provide equipment, including:
 - NCIT
 - ACC
 - Cochlear Limited
 - Phonak (Sonova New Zealand Limited)
 - Enable New Zealand Limited
- Other professionals who may be involved in your or your child's care to ensure appropriate services are provided to you or your child. This may include:
 - GP
 - Advisors on Deaf Children ("AoDC")
 - Resource Teachers of the Deaf ("RTD")
 - Paediatricians
 - ENT specialists
 - Audiologists
 - Hearing Life Therapists
 - Gillies Hospital
- We have a legal obligation (Oranga Tamariki Act, 1989, Section 15), to report to Oranga Tamariki or to the New Zealand Police, if we are concerned about the welfare of any child who we encounter while providing services.
- To third party service providers that help us provide our services. This may include information technology systems service providers, as well as researchers as set out in "The Hearing House Research Database" section of this privacy policy below.

The Hearing House Research Database

The Hearing House may operate a cochlear implant research database (**Database**) in the future. Once established, our intention is that the Database will be a major research resource assisting The Hearing House to provide a coordinated, collaborative and informed cochlear implant service to individuals, with the overall goal to increase awareness and help individuals who have hearing loss. It is your decision (or your decision on behalf of a child under 16), to participate in the Database and provide your personal information for us to use when the Database is operational.

The effectiveness of the Database depends on a range of factors, including the amount and range of data that it holds. If you consent to your, or your child's, personal information being used on our Database (using our consent form), we will:

- use the following personal information in our Database, including:
 - the information you have provided to us in your enrolment consent form; and
 - any other information we request or you make available to us, from time to time, when we provide our services to you or your child (including information you have made available to us in the past, from when you or your child were enrolled in our services);
- only carry out research with you or your child's information for purposes such as:
 - understanding the impact of hearing loss on human development and aging;
 - understanding factors that may affect hearing loss; and
 - developing new insights into technology to assist hearing,and we will only publish, report, or otherwise make available publicly anonymised/ aggregated research outcomes and findings, so that you or your child are not identifiable by persons outside of The Hearing House;



- provide Database access to, and share you or your child's information with, third parties that help us (including third party researchers), in order to carry out the purposes set out above. We only provide Database access to, and/or share you or your child's information with, limited third parties and on a "need to know" basis. All third parties we engage are subject to our robust vetting procedures, and are subject to our contractual privacy, confidentiality and security obligations; and
- hold you or your child's information in the Database for the course of you or your child's natural life and beyond (ie after death).

We will de-identify all information before any research is published, meaning those outside of The Hearing House who see any of our research created using the Database will not be able to identify you or your child. We will do this by assigning a unique identifier to you or your child's information.

We will continue to ensure The Hearing House has strict security measures in place to ensure all information it holds in the Database is protected from loss and unauthorised access, use, modification and disclosure.

Storage and Security

Storage

We currently store our electronic data, which includes personal information, on secure servers located on site; including our client records and data management system. We also use a cloud-based client management system and data management system. Access to the data that we hold is limited to staff with appropriate access permissions and is password protected. We also store personal information in individual paper files in an alarmed and locked room (after hours).

We use Microsoft Office applications for our email and other office productivity applications. We use an online booking system ("Timely") to manage our clinical scheduling. Use of these applications means some of the personal information we hold may be transferred to, or accessed from, countries other than New Zealand, by our service providers.

Security

We take all reasonable steps to ensure the personal information we collect is protected against loss, unauthorised access and disclosure or any other misuse.

We ensure that our third party data processors can meet our privacy and security requirements. We are satisfied, for example, that Timely has adequate security and privacy safeguards in place to protect information it holds on our behalf. You can read more about Timely's privacy and security practices at <https://www.gettimely.com/support/privacy/>

Your privacy rights and how to contact us

The Privacy Act gives you the rights to request access to and correction of the personal information we hold about you. You can take steps to control the ways we use your information such as whether you consent to be contacted about research or fundraising.

To exercise any of these rights please either contact us by:

- Emailing us at clinicalservices@hearinghouse.co.nz
- Calling us on 0800 254 783
- Writing to us at PO BOX 74022, Greenlane, Auckland 1546



Requesting access to or correction of your information

You have the right to request confirmation of whether we hold your personal information, and to request access to any such information that hold about you (whether we have collected from you directly or from a third party). You also have the right to ask us to correct your information if you think it is wrong and to provide a statement of correction sought.

We will process your request as soon as possible, and no later than 20 working days after we receive it. We may occasionally need to withhold personal information under sections 27-29 of the Privacy Act but we will only ever withhold information where necessary.

Opting out of certain uses

You can opt out of your personal information being used in certain ways depending on the consent you provide when you or your child enrolls with our service. For example you can opt out of being contacted about potential research projects or having your images or story used for media and fundraising purposes. You have a right to withdraw or update your consents at any time.

Complaining about our privacy practices

If you have any concerns about our privacy practices then please contact us in the first instance and we will try our best to resolve it.

You also have a right to complain to the Office of the Privacy Commissioner. You can find out more information from <https://www.privacy.org.nz/your-rights/making-a-complaint/>.