

Policy owner: Privacy Officer

Approved by: Chief Executive

Effective date: September 2026

Review date: September 2028, or earlier if legislation, contractual arrangements or THH systems materially change

1. Purpose

The Hearing House is committed to respecting and protecting the privacy of the people and whānau we work with.

This policy explains how The Hearing House collects, holds, uses, discloses and protects personal information and health information, and the rights people have in relation to information we hold about them.

The Hearing House handles personal information in accordance with the **Privacy Act 2020**, the **Health Information Privacy Code 2020**, including amendments in force from 1 May 2026, the **Health (Retention of Health Information) Regulations 1996**, and other applicable New Zealand legislation.

2. Who this policy applies to

This policy applies to personal information held by The Hearing House about:

- Kiritaki/clients who receive or are being assessed for our services
- Children and young people
- Parents, guardians, whānau and authorised representatives
- Donors and supporters
- Research participants
- People who attend THH events or participate in communications or fundraising activities
- Visitors and other people who interact with The Hearing House

Different rules may apply depending on the type of information involved. Health information is subject to the Health Information Privacy Code 2020.

3. Our approach to privacy

We aim to be open and transparent about how we handle personal information.

We will:

- Collect only information that we have a lawful purpose for collecting and that is necessary for that purpose
- Collect information fairly and lawfully
- Tell people why we are collecting their information and how it will be used, unless an exception applies
- Take reasonable steps to keep information accurate, secure and protected against unauthorised access, use, modification, disclosure or loss
- Use and disclose information only where permitted by law
- Provide people with access to their information and the opportunity to request correction
- Retain information only for as long as required by law or for a lawful purpose
- Appropriately manage and respond to privacy breaches

4. Information we collect

The information we collect depends on a person's relationship with The Hearing House and the services we provide.

For kiritaki/clients this may include:

- Name, date of birth and contact details
- NHI number
- Demographic information
- Details about parents, guardians, whānau, caregivers or authorised representatives
- Information relevant to eligibility for publicly funded or other services
- Medical, audiological and other health information
- Referral information
- Information relating to cochlear implants, hearing aids and other hearing technology
- Audiograms, speech perception assessments, language assessments and other clinical test results
- Clinical notes, assessments, reports and rehabilitation or habilitation plans
- Correspondence and communications concerning a person's care
- Information about appointments and services received
- Information provided through questionnaires and surveys
- Consents and preferences relating to research, communications, fundraising, photographs, video, personal stories or other media.

We may also collect information about donors, supporters and people participating in fundraising, events, research or communications activities.

People do not generally have to provide personal information to us unless provision of that information is required by law. However, if we do not receive information that is reasonably necessary to provide a health or disability service, we may not be able to assess eligibility, make appropriate clinical decisions or provide some or all of our services.

5. Collecting information directly from you

Where practicable, we collect personal and health information directly from the individual concerned or their representative.

When we collect information directly, we take reasonable steps to explain matters such as:

- That the information is being collected
- Why we are collecting it
- Who may receive it
- Whether providing the information is voluntary or mandatory and, where applicable, the legal authority for collection
- What may happen if the information is not provided
- The person's rights to access and request correction of their information

This information may be provided through enrolment forms, consent forms, privacy notices, discussions with our team or this policy.

6. Collecting information from other people or organisations

Because The Hearing House provides specialist health and disability services, we may need to receive information about a kiritaki/client from other people or organisations.

Depending on the circumstances, these may include:

- General practitioners and other health professionals
- Health New Zealand | Te Whatu Ora services
- Audiology, ear, nose and throat, paediatric, radiology, genetics and other specialist services
- Schools and education professionals
- Ko Taku Reo
- Government agencies

- ACC
- Disability support and equipment providers
- Cochlear implant, hearing aid and related technology manufacturers
- Hospitals and surgical service providers
- Immigration New Zealand where residency or eligibility needs to be confirmed;
- Another cochlear implant programme or service provider
- Other organisations involved in a person's care or support.

We will only collect information from another source where this is permitted by the Health Information Privacy Code, the Privacy Act or another law.

7. Notification when information is collected from someone else

From 1 May 2026, additional notification requirements apply when health information is collected indirectly.

Where The Hearing House collects health information about a person from someone other than that person or their representative, we will take reasonable steps, as soon as reasonably practicable, to ensure that the person or their representative is aware of the collection and the information required by the Health Information Privacy Code.

There are exceptions to this requirement. For example, notification may not be required where the person has already been made aware of the collection, where another agency has already provided the required notification, or where another exception in the Code applies.

8. Information we create

We also create personal and health information when providing our services.

This may include:

- Clinical and appointment notes
- Correspondence, including letters, emails and relevant messages
- Assessment and progress reports
- Test and clinical results
- Clinical opinions and recommendations
- Treatment, habilitation or rehabilitation plans
- Referrals
- Information about cochlear implant or hearing technology programming and management
- Records of decisions relating to a person's care

9. How we use personal and health information

We may use information for purposes including:

- Assessing a person's needs and eligibility for services
- Assessing cochlear implant candidacy
- Recommending and providing cochlear implants, hearing aids and other hearing technology
- Arranging or coordinating surgery and other health services
- Programming, maintaining and supporting cochlear implant and hearing technology
- Providing audiology, speech-language therapy, habilitation, rehabilitation, counselling and other support
- Monitoring progress and outcomes
- Communicating with kiritaki/clients, whānau and other people involved in their care
- Making referrals or coordinating care with health, education, disability and other professionals
- Obtaining funding or meeting funding requirements
- Meeting contractual, reporting, audit and accountability requirements
- Managing appointments and service delivery
- Quality assurance, clinical governance and service improvement
- Managing complaints, incidents and clinical reviews
- Statistical analysis, planning and evaluation
- Approved research
- Communications, fundraising and marketing where permitted and, where required, with consent
- Complying with our legal obligations

If we wish to use identifiable information for a purpose that is materially different from the purpose for which it was collected, we will only do so where permitted by law, including where appropriate obtaining authorisation.

10. Sharing information

We do not sell personal information.

We may disclose personal or health information where disclosure is authorised or permitted by the Privacy Act, the Health Information Privacy Code or another law.

Depending on the circumstances, information may be shared with:

- Health professionals involved in a person's assessment, treatment or care
- Hospitals and surgical service providers
- Education professionals involved in supporting a child or young person
- Government agencies and funders
- ACC and other relevant funding bodies
- Disability support organisations
- Cochlear implant, hearing aid and related technology manufacturers where information is required for clinical care, equipment management or funding
- Laboratories, imaging providers and other clinical service providers
- Researchers, where appropriate approvals, authorisations and safeguards are in place
- Professional advisers, auditors, insurers or other service providers where necessary and subject to appropriate confidentiality and privacy obligations
- Other organisations where disclosure has been authorised or is otherwise permitted or required by law

Where practicable, we disclose only the information reasonably necessary for the relevant purpose.

11. Child safety and wellbeing

The safety and wellbeing of children and young people is a priority for The Hearing House.

Where a staff member has concerns about the safety or wellbeing of a child or young person, The Hearing House will respond in accordance with its Child Protection Policy and applicable law.

Information may be shared with Oranga Tamariki—Ministry for Children, New Zealand Police or another appropriate agency where disclosure is authorised or permitted by law.

Section 15 of the Oranga Tamariki Act 1989 allows a person who believes a child or young person has been, or is likely to be, harmed, ill-treated, abused, neglected or deprived, or who has concerns about their wellbeing, to report those concerns to Oranga Tamariki or Police.

Nothing in this privacy policy prevents staff from taking appropriate action to protect a child or young person.

12. Children and young people's privacy

Children and young people have privacy interests of their own.

Where information relates to a child or young person, The Hearing House will consider the child's age, maturity, circumstances, best interests and applicable provisions of the Health Information Privacy Code when deciding how information should be collected, used, accessed or disclosed.

Parents, guardians and representatives may have rights to act on behalf of a child, but those rights are subject to the Privacy Act, the Health Information Privacy Code and other applicable law.

Where appropriate, we will involve children and young people in decisions concerning their information in a way that reflects their age and ability to understand the decision.

13. Research

The Hearing House supports research intended to improve understanding, services, technology and outcomes for people who use cochlear implants and related hearing services.

Participation in research is voluntary unless information is being used in a form that is not identifiable and the use is otherwise permitted by law.

Where identifiable information is used for research requiring consent, we will explain the proposed research and seek appropriate informed consent.

Research may involve:

- clinical and service outcome information;
- audiological information and test results;
- demographic information;
- information about cochlear implant or hearing technology use;
- questionnaires or other information provided by participants; and
- information created in the course of providing services.

Research involving identifiable health information will be undertaken in accordance with applicable privacy requirements and, where required, research ethics processes.

Research findings intended for publication will not identify an individual unless that person has specifically authorised identification.

Access to identifiable research information will be limited to people who require access for an authorised purpose and who are subject to appropriate confidentiality, privacy and security requirements.

14. Retaining information

Health information is subject to specific retention requirements.

Health service providers are generally required under the Health (Retention of Health Information) Regulations 1996 to retain health information for at least **10 years from the date services were last provided**, unless an applicable exception applies.

Some information may need to be retained for longer where there is a continuing lawful purpose, including clinical, legal, contractual or approved research purposes.

We will not retain identifiable personal information indefinitely merely because it may be useful in the future. Once applicable retention requirements have been met and there is no longer a lawful reason to retain information, it will be securely destroyed, deleted or de-identified as appropriate.

15. Storage and security

The Hearing House uses physical and electronic systems to hold information.

These may include secure clinical and administrative systems, approved cloud-based services, email and document-management systems, databases and paper records.

We take reasonable safeguards appropriate to the sensitivity of the information we hold. These include measures relating to:

- User access and authentication
- Access being limited according to role and business need
- Physical security
- Password and system security
- Staff confidentiality obligations
- Staff privacy and information-security training
- Secure handling and disposal of information
- Management of contractors and service providers
- Responding to suspected privacy and security incidents

No information system can be guaranteed to be completely secure. We regularly consider privacy and information-security risks and take reasonable steps to manage them.

16. Service providers and information held overseas

Some of the technology and service providers used by The Hearing House may store, process or allow access to information outside New Zealand.

Where personal information is disclosed to a person or organisation outside New Zealand, we will comply with the applicable requirements of the Privacy Act 2020, including the cross-border disclosure requirements.

This may include satisfying ourselves that the overseas recipient is subject to the Privacy Act or comparable privacy safeguards, putting appropriate contractual protections in place, or obtaining the individual's informed authorisation where required.

The use of an overseas-based cloud or technology provider does not necessarily mean there has been a disclosure for the purposes of the Privacy Act. We assess our arrangements according to their particular circumstances.

17. Accuracy of information

We take reasonable steps before using or disclosing personal information to ensure that it is accurate, up to date, complete, relevant and not misleading.

We also encourage kiritaki/clients and whānau to tell us when their contact details or other relevant information changes.

18. Access to your information

You have the right to ask whether The Hearing House holds personal or health information about you and to request access to that information.

Requests may be made to our Privacy Officer using the contact details below.

We will respond as soon as reasonably practicable and within the timeframe required by law, which will generally be no later than **20 working days** after receiving the request.

In some circumstances we may lawfully withhold information or refuse access to part of a record. If this occurs, we will explain the applicable reason unless the law permits us not to do so.

19. Correcting your information

You may ask us to correct personal or health information you believe is inaccurate.

If we agree that a correction should be made, we will take reasonable steps to correct the information and, where required, tell people to whom the incorrect information has previously been disclosed.

If we do not make the requested correction, you may provide us with a statement setting out the correction you sought and ask us to attach that statement to the information.

20. Communications, fundraising, photographs and stories

We may invite people to receive information about The Hearing House, participate in fundraising activities or allow their photographs, video, experiences or stories to be used in communications.

Where consent or authorisation is required, participation is voluntary.

A person may change or withdraw their communication or media preferences by contacting us. Withdrawal will apply to future use so far as reasonably practicable but may not be capable of reversing material that has already lawfully been published or distributed.

21. Use of Artificial Intelligence (AI)

The Hearing House may use approved artificial intelligence (AI) tools to support administrative, reporting, analysis, communication and other operational activities.

AI supports, but does not replace, professional judgement or appropriate human oversight. Diagnosis, treatment recommendations and other clinical decisions remain the responsibility of appropriately qualified health professionals.

Where AI involves personal or health information, staff must use only approved AI tools, use the minimum information reasonably necessary, and comply with The Hearing House's privacy, confidentiality and information-security requirements. Personal or health information must not be entered into publicly available or unapproved AI tools.

AI-generated information must be appropriately reviewed before it is relied upon, communicated externally or included in a client record. The Hearing House's use of AI will comply with the Privacy Act 2020 and Health Information Privacy Code 2020.

22. Privacy breaches

A privacy breach includes unauthorised or accidental access to, disclosure, alteration, loss or destruction of personal information, or circumstances that prevent us from accessing information.

The Hearing House will investigate suspected privacy breaches and take appropriate steps to contain the incident, understand what occurred, reduce the risk of harm and prevent recurrence.

Where a privacy breach has caused, or is likely to cause, serious harm, we will notify the Office of the Privacy Commissioner and affected individuals as soon as practicable, unless an exception under the Privacy Act applies.

Staff must promptly report suspected privacy breaches in accordance with THH's privacy breach and incident-management procedures.

23. Privacy Officer

The Hearing House has a Privacy Officer responsible for supporting compliance with the Privacy Act and Health Information Privacy Code and assisting with privacy questions, requests and complaints.

You can contact us about privacy by:

Email: privacyofficer@hearinghouse.co.nz

Phone: 0800 254 783

Mail: Privacy Officer, The Hearing House, PO Box 74022, Greenlane, Auckland 1546

24. Complaints

If you have a concern about how The Hearing House has handled your personal or health information, please contact our Privacy Officer first so that we can investigate and try to resolve the matter.

You also have the right to make a complaint to the **Office of the Privacy Commissioner | Te Mana Mātāpono Matatapu**.

Information about privacy rights and making a complaint is available at the Office of the Privacy Commissioner's website.

24. Changes to this policy

We may update this policy when our services, systems, contractual arrangements or legal obligations change.

Material changes will be reflected in the version published by The Hearing House.

Current version: September 2026