



Privacy at Accessable

How we use your information to empower you

Accessible works with health agencies, including ACC and District Health Boards, to deliver equipment and housing modification services nationwide. This is our privacy statement, which explains what we do with the health information we collect to ensure that we can **deliver the right product to the right person, at the right place, at the right time, at the right price** (our R5 strategy).

You may not have a choice about sharing your health information with us, so we want to be as open as possible with you about the information we collect and how we use and share it to deliver services. We take our role as a custodian of health information seriously and know that privacy is an important part of community trust in our services.

We've developed a secure and trusted system to share health and personal information safely among the people involved in your care. This system, and the processes we've developed to support it, are designed to:



Keep health information to a minimum – we collect only the information we really need to assess applications and deliver services



Tightly control access to health information – our portal and platform limit who can see health information, on a strictly need-to-know basis



Limit the use of health information – we've set a clear purpose for collecting and processing personal information (our R5 strategy) and we won't deviate from this



Keep health information safe and secure – we've built data security into our platform and processes, to protect you and your information from harm



Empower people and enable rights – we'll be as open as we can with you about your information, and you can ask for a copy any time

We may update this privacy statement from time to time, to reflect changes to privacy law or our business operations. This privacy statement was last updated in [Month] 2019.



Collecting your information

We generally only collect health information about you to meet our core purpose of ensuring that we can **deliver the right product to the right person, at the right place, at the right time, at the right price**. If we collect it for any other purpose, we will let you know at the time you're asked to provide it.



How we collect your information

Most of the health information we collect is **provided to us by your healthcare provider** or another third party with a legitimate role in your healthcare.

We may collect health information **from you directly** (or from your carer, support worker or family/whanau on your behalf) when we're assessing your needs, delivering products or services or maintaining products we've already delivered. We may also **generate** information about you internally when we're delivering services.

In all cases, we'll only ever collect or generate the minimum amount of health information necessary to meet our purposes.

What information we collect

We may collect the following health information about you:

- full name
- contact information, such as address, phone number and email
- date of birth
- gender
- ethnicity
- disability type
- residency status
- NHI number
- claim number (if we are delivering services on behalf of ACC)
- detailed health information, such as assessment reports and other relevant information about your disability or condition
- information about historical applications and cases
- photographs, for example when we complete a house modification assessment
- administrative information, such as your DHB, your GP, your representative or information about your property
- call recordings, where you have contacted our call centre
- correspondence from or with you about the services we are delivering
- internally generated information, such as operational notes, job requests or other records



We may also collect the following information about you when you use our websites or online services (such as Online Catalogue Ordering):

- IP address
- browser type
- domain name
- date and time of your visit to the website
- website you visited immediately before our website
- web pages you view and documents you download
- cookies

A word on cookies

Our websites use "cookies" to personalise your online experience. A cookie is a text file that is placed on your hard disk by a web server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

Cookies tell the web server that you have returned to a specific page. For example, if you personalise *accessable* pages, or register for particular services, a cookie helps us to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same *accessable* website, the information you previously provided can be retrieved, so you can easily use the features that you customised.

You have the ability to accept or decline cookies. Most browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the *accessable* services or websites you visit.



Using your information to deliver services

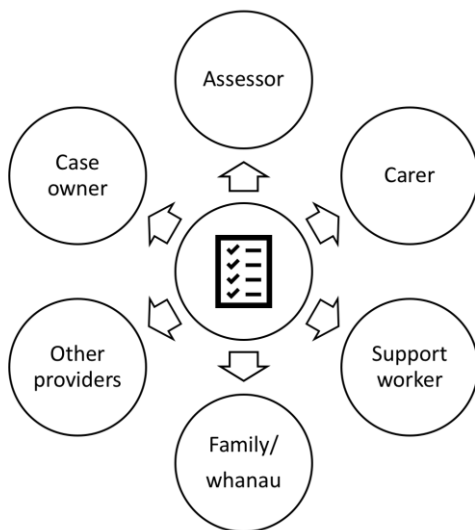
We use and share your health information only in ways that support our core purpose – ensuring that we can **deliver the right product to the right person, at the right place, at the right time, at the right price**. Where we need to use your information for wider purposes, such as improving our business or meeting our reporting requirements, we usually anonymise it first.

How we use your information

In order to achieve our core purpose, and effectively meet the needs of our end users, the healthcare providers that use our services, and the wider healthcare community, we may use your health information to:

- assess applications for equipment or services
- deliver equipment or services, or maintain equipment already in use
- contact you about the equipment or services you've received or are receiving
- ensure the health and safety of our end users, staff and subcontractors
- meet our contractual or legislative reporting requirements
- conduct research and analysis to continuously improve our business and the services we provide (we anonymise and aggregate health information before doing this)
- operate and improve our website and online services (this relates only to the website data we collect)

When we share your information



We work as part of a dedicated wraparound team committed to delivering rehabilitation services. This requires collaboration and information sharing, to ensure that the right decisions are made, and you get the services and products you need to recover.

We've designed our platform and processes to facilitate this collaboration and information sharing, but also to ensure that your privacy is protected. Our platform permits certain people or agencies to see information about you, including historical information where this is relevant to assessing your current needs.

We may share your health information with:

- **assessors or case owners** from the healthcare providers managing your care or rehabilitation, such as ACC or your District Health Board
- **your carer, support worker or family/whanau**, where we believe this is necessary to ensure your rehabilitation is successful
- **suppliers**, where necessary to select the correct equipment and deliver services
- **subcontractors or other providers**, where necessary to deliver equipment and services
- **our trusted data service providers**, for the purposes of storing or processing your information

We share anonymised and aggregated health information about our end users, and the services they receive, with our **funding agencies**, such as ACC or the Ministry of Health, and with other **relevant government agencies** where required.



We also like to share our success stories – the services that have made a real difference to our end users – with the public. We will only ever share your story, including photographs, with your express authorisation.

Sometimes, we may need to share health information about you in ways that we have not anticipated or explained above. We'll always ensure that any unexpected disclosures of health information are:

- **lawful** – either permitted by the Privacy Act or required or permitted by another law
- **necessary** – reasonably necessary for a lawful purpose
- **permitted** – permitted by the healthcare providers we work for and with

Keeping your information safe

Where we store your information and how long we keep it

We store and process the health information we collect using Microsoft applications, hosted on Microsoft Dynamics and Microsoft Azure platforms, in Australian-based cloud servers. This means that the health information we hold may be transferred to, or accessed from, countries other than New Zealand.

We must retain health information in compliance with the Health (Retention of Health Information) Regulations. This means we keep your information for at least 10 years after our last contact with you. After this period, we will either securely destroy your information or retain it in an aggregated and anonymised form.

How we protect your information

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 endeavor to meet the best practice standards of the Health Information Standards Organisation and the expectations of the healthcare providers we work with and for, including the Ministry of Health.

Most of the personal information we hold is stored and processed on Microsoft cloud platforms. Microsoft has put a number of security and privacy safeguards in place to protect information it holds on our behalf. You can read more about Microsoft's privacy and security practices at <https://www.microsoft.com/en-us/trustcenter>.

In addition to using safe and secure systems, we:

- require our staff and contractors to comply with our Information Security Policy and Acceptable Use of IT Policy
- require our staff and contractors to sign a Security Access Agreement and agree to confidentiality clauses in their employment agreements



- give our staff and contractors information security training when they start and at regular intervals during their employment
- restrict access to systems and health information based on legitimate business need
- audit and monitor access to systems and health information
- obtain third party audits of our organisational information security practices to ensure they're fit for purpose

Contacting us about your information

To make a privacy request or ask about our privacy practices, please:

- call us on 0508 001 002
- email us at privacy@accessable.co.nz
- write to us at The Privacy Officer, Accessable, PO Box 27 804, Mount Roskill, Auckland 1440

Accessing or correcting your information

You have the right to ask us for a copy of the health information we hold about you (whether we've collected it directly from you or from your healthcare provider). You also have the right to ask us to correct your information if you believe it is wrong.

You can only make a request about your own information, unless you have someone else's authority to make a request on their behalf. We may need to verify your identity or authority before responding to your request. Once we've verified who you are, we'll try and respond to your request as soon as possible, and no later than 20 working days after we receive it.

Sometimes, we may need to transfer your request to another agency, such as a healthcare provider, where we do not hold the information your request is about, or we feel that this other agency is better placed to respond to it. If we need to do this, we'll tell you as soon as possible.

Complaining about our privacy practices

If you have any concerns about the way we've collected, used or shared your health information, or you think we have refused a request for information wrongly, then please let us know – using our Complaints Management at <https://www.accessable.co.nz/complaints-management/> – and we'll try our best to resolve them.

If we can't resolve your concerns, you can also make a complaint to the Office of the Privacy Commissioner by:

- completing an online complaint form at www.privacy.org.nz
- writing to the Office of the Privacy Commissioner, PO Box 10-094, The Terrace, Wellington 6143