

# Privacy Policy

February 2022



bridge housing

## 1.0 Purpose

To outline the Bridge Housing commitment to the protection of privacy.

## 2.0 Revision History

Date	Revision No.	
October 2021	Original Document 1.0	Privacy Policy

## 3.0 People/Areas Affected

- Members of the Board
- All employees working on behalf of Bridge Housing

## 4.0 Policy

Release of information, and access to and handling of personal information about any individual is governed by the Privacy Act, unless the Family Violence Act 2018 and/or the Oranga Tamariki Act 1989 override it. All Bridge employees should make themselves familiar with the various Acts and apply it to BHCT work. BHCT's standards and guidelines for handling requests for confidential information should be followed at all times.

'Confidential Information' means all transactions, records and information relating to the business of BHCT, whether held in hard copy form, electronically or otherwise, including (but not limited to):

- Any information, knowledge or material which BHCT may designate as proprietary;
- Client and customer information;
- Business and financial information pertaining to BHCT, including salary and the terms and conditions of employment;
- Technical information, including services, techniques, designs, processes, data, formulae, programming or research of BHCT;
- Know-how, inventions, designs, compositions, improvements or other matters connected with products or services manufactured, marketed, provided or obtained by BHCT.

Both during the Employee's employment and after termination, the Employee is required to keep confidential all Confidential Information. The Employee must not release any information unless they are satisfied that they have the appropriate written authority to do so.

### Collecting information

The personal information BHCT collects may include a person's name, date of birth, addresses, email address, telephone numbers, gender, financial information and any other information provided in connection with, or specifically related to their communications with or, use of our services or facilities.

BHCT may collect personal information as set out below: When a person, or someone acting on their behalf:

- applies for housing with us,
- applies for employment with us,
- corresponds with us, whether in person, by letter, phone, text, email, instant messages or other means of electronic communication,
- completes and submits forms we provide for applications for housing or other authorisations or for the use of any of our services or facilities, including signing up for and using our online services,
- uses any of our services or facilities,
- subscribes to any of our newsletter or update services, and/or
- follows or posts comments in response to our social media or other facilities such as Facebook.

We may collect personal information from other organisations, entities or persons, such as: Ministry of Social Development, Ministry of Housing and Urban Development, Support agencies, and The New Zealand Police, credit reporting agencies and other organisations, entities and persons where a person has expressly authorised them to provide us with information.

We may keep a record of any information that we acquire.

We may monitor and record phone calls made to or by us for quality control or staff training purposes. If a call we make is to be monitored and recorded, the other party will be informed of this at the time of the call.

We may use technology solutions such as “cookies” on our website to provide visitors with better access to tailored information and services on the website and to better serve them when they return.

Our internet service providers may also make a record of visitors and log information for statistical purposes. This information is only analysed on a bulk basis for broad demographic content. Individual use is not analysed. We do not attempt to identify users or their browsing activities unless they choose to give us personal information while using our website.

#### Using information

The personal information that we collect may be used for any of the following purposes:

- To provide people with services or facilities.
- To positively confirm a person’s identity, to avoid inappropriate release or use of information.
- To respond to correspondence or to provide information a person has requested.
- To process an application for housing.
- To process an application to use or to register for any of our services or facilities.
- To process payments received by, or made by BHCT,
- To respond to requests, enquiries or feedback, or for customer care related activities.
- To provide information about our events, news, services or facilities, or the events, news, services or facilities of BHCT that we consider may be of interest to the recipient.
- To comply with relevant laws and regulations.
- To carry out activities connected with the running of our business or operations such as

- personnel training or testing and maintenance of computer and other systems.
- For any specific purpose, which we notify at the time the personal information is collected.
- For general administrative and business purposes.

### Sharing information

We may disclose personal information to:

- Any person engaged by BHCT to provide products or services on our behalf, where a person's personal information is necessary for the provision of those products or services.
- BHCT employees and Board members, in order to assist with the functions and services that we provide.
- A third party if we are required to do so under any laws or regulations, or in the course of legal proceedings or other investigations. This may include sharing CCTV footage with the New Zealand Police or other public-sector agencies where criminal activity is reported or suspected. The New Zealand Police may also access feeds from certain CCTV cameras from time to time, for law enforcement, investigation and emergency response purposes.
- Any person we are authorised to disclose personal information to.
- Any person, if that information is held in a public register, e.g. information held on property files or the rating information database.

### Failure to provide personal information

If someone does not provide us with all of the personal information that we request, we may not be able to adequately respond to their correspondence, process any applications they have submitted, provide the services or facilities they have requested, process payments or otherwise deal with any requests or enquiries they have submitted.

In some circumstances, failure to provide information when requested may be unlawful, and/or result in legal consequences. These circumstances and the potential consequences will be explained when personal information is collected.

### Security and accuracy

We take reasonable steps to ensure personal information is:

Protected against loss, damage, misuse and unauthorised access. We restrict access to personal information to those individuals who need access to this information in order to assist us in performing our duties and obligations, and accurate, up to date, complete, relevant, and not misleading.

### Breach of Privacy

In the event of a breach of the Privacy Act, the person who causes or discovers a breach must as soon as practicable report the breach to the General Manager (GM), who will then report the breach to the Board.

The GM must determine whether the privacy breach is a notifiable privacy breach. Factors that may be relevant to this determination include the sensitivity of the personal information involved, nature of the harm that may be caused, whether the information was protected by security measures, the distribution of the information and the nature of the recipient, and the

ability to contain the breach or its consequences. It should also be noted that the test for emotional harm is subjective, and so consideration should be given to the particular sensitivities of the data subject(s) affected.

Where the GM has determined that the privacy breach is a notifiable privacy breach, the GM must prepare a notification to the Privacy Commissioner, or any other relevant regulator, and the data subjects affected.

Privacy breach notifications must be made to the Privacy Commissioner and data subjects affected as soon as practicable after BHCT has become aware of the privacy breach.

#### Holding personal information

We may retain all personal information that we collect (on both our active systems and our archive systems), for as long as administratively necessary.

#### Accessing and correcting personal information

Anyone may request confirmation whether we hold any personal information about them and may request access to their personal information that we hold by emailing us or otherwise contacting us, at the addresses provided below. Once we have verified their identity we will provide them with such confirmation and access unless one of the grounds for refusal to do so under the Privacy Act applies.

Anyone may request that the personal information we hold about them be corrected by emailing us. If we agree that their personal information is to be corrected, we will provide them with an amended record of their personal information if requested.

A person's rights of access to and correction of any personal information we hold about them is subject to the procedures set out in the Privacy Act.

## 5.0 Date

The review date of the policy will be annually.



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Approved by Bridge Housing Chair

30 / 10 / 2021