

## **COMMUNITY HOUSING AOTEAROA DRAFT PRIVACY POLICY v1**

### **POLICY AND PROCEDURES STATEMENT TO BE PROVIDED TO ORGANISATIONS AND INDIVIDUALS WE ARE COLLECTING PERSONAL INFORMATION FROM**

This privacy policy sets out how we (Community Housing Aotearoa Incorporated and Community Housing Solutions Limited) will handle personal information we collect about you, including through our website, social media, and through phone, email and other channels.

Community Housing Aotearoa's privacy policy is based on [the principles of the Privacy Act 2020](#).

#### **Personal information**

Personal information has the meaning given to it in the Privacy Act 2020 (information about an identifiable individual).

#### **Changes we can make to this policy**

We can change this policy from time to time by providing an updated version on our website. We recommend regularly checking our website for updates.

#### **What we collect:**

We collect personal information from you, including information about your:

- name
- contact information limited to email address(es), phone numbers, titles/roles and business addresses
- interactions with us
- billing or purchase information

We collect organisational information on:

- billing or purchase information
- housing supply data
- anonymised remuneration and job descriptions
- charities information

### **Why we collect it**

We collect information in order to:

- provide our services to you
- maintain a membership database
- deliver and evaluate the performance of webinars and other events
- contact you regarding housing and related matters that may be of interest to you (*you may opt out at any time*)
- bill you and collect any debt owed to us
- for internal research, development and optimisation of our services
- to comply with Aotearoa New Zealand laws and any applicable overseas laws
- to manage our relationship with you, and to exercise and enforce our rights
- to carry out any activity in connection with a legal, governmental or regulatory requirement on us, or in connection with legal proceedings and crime.

### **Sharing your information**

Besides our staff and leadership team, we share this information with:

- the Ministry of Housing and Urban Development in order to report on the performance of our contracted services – for example the geographical location of the organisations that attend our webinars
- the Ministry of Social Development and Kāinga Ora, for the purposes of evaluating and reporting, or for the purposes of arranging events and webinars
- contracted individuals/organisations who provide services to us or who assist us in the delivery of our services such as webinars, in person events, and communications – for example, conferences and events.

We may release personal information where we think this is appropriate for legal compliance and law enforcement (including to government agencies with statutory law enforcement responsibilities), to facilitate court proceedings, enforce or apply any terms that apply between you and us, or to protect us, our stakeholders, or others.

We can also release personal information to third parties as instructed by you, and in other ways permitted by the Privacy Act.

Providing some information is optional. If you choose not to enter contact names, numbers and addresses and billing or purchase information, we'll be unable to provide key peak body services.

### **How we store your personal information**

We keep your information safe by storing it in password protected cloud-based systems and a third party hosted off-line backup server. We choose to work with reputable third-party contractors and require password protected devices as part of working as our contractor, as of August 2022.

Financial information related to payments and receipts will be held for 7 years or such longer period as may be necessary to comply with laws and to provide continuing services.

### **Rights to access your personal information**

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at [support@communityhousing.org.nz](mailto:support@communityhousing.org.nz), or +64 4 385 8722, or PO Box 11543.

### **Where you provide us information about others**

If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that information to us, so that, without us taking further steps required by applicable data protection or privacy laws, we may collect, use, and disclose such information for the purposes described in this privacy policy.

You must take reasonable steps to ensure the relevant individual is aware of, and agrees to the matters set out in this policy, including the fact their information is being collected, the purposes for which that information is being collected, the intended recipients of their information, their rights to access their information, and our name and contact details.

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## **OUR INTERNAL PRIVACY PROCEDURES**

### **Privacy Officer**

The Privacy Act requires organisations to have at least one person who fulfils the role of Privacy Officer.

### **The Privacy Officer at Community Housing Aotearoa and Community Housing Solutions is the Chief Executive Officer.**

It is the role of the Privacy Officer to:

- be familiar with the privacy principles in the Privacy Act
- work to make sure the organisation complies with the Privacy Act
- deal with any complaints from the organisation's clients about possible privacy breaches
- deal with requests for access to personal information, or correction of personal information
- act as the organisation's liaison with the Office of the Privacy Commissioner.

They may also:

- advise their organisation on compliance with privacy requirements
- advise their organisation on the potential privacy impacts of changes to the organisation's business practices
- advise their organisation if improving privacy practices might improve the business
- be familiar with any other legislation governing what the organisation can and cannot do with personal information.

### **Recordings of online meetings**

Our peak body services are increasingly conducted online, and it is generally understood that we will record online meetings for the purposes of fulfilling or improving peak body services.

- 1) Prior to recording a Zoom or Teams meetings, we notify participants and give them reasonable time to turn their videos or other identifying characteristics off.
- 2) Storage of the recordings is in password protected cloud-based systems and a third party hosted off-line backup server.
- 3) Timeline for deletion will depend on the nature of the information. For the purposes of note taking and verification of proceedings, recordings will be stored for up to 90 days.
- 4) Recordings of workshops/seminars and similar for educational purposes may be held for as long is needed to achieve the purposes outlined in this privacy policy.
- 5) Prior to conducting webinars, we make it clear to participants that we use the reports generated by Zoom, Teams and other similar platforms to support our evaluation of our peak body services, including in reporting to our Council and to the Ministry of Housing and Urban Development. Information we include is anonymised, but may include information on organisation size, type of housing services provided and geographic location.
- 6) Should we wish to include information from our online meetings in publicly-available reports, we will seek express permission from the relevant participants. For example, if we wish to support evidence with a quote.

### **Images**

At CHA our use of images of people is as per the guidelines below:

- 1) We always seek permission to use images taken by others for our purposes, such as on social media. Where applicable, we license the image.
- 2) We always seek permission to use images of others for the purposes of communications or promotion, even when they are our proprietary images.

## Procedures in the event of a privacy breach

A privacy breach may occur when an organisation or individual either intentionally or accidentally:

- Provides unauthorised or accidental access to someone's personal information.
- Discloses, alters, loses or destroys someone's personal information.
- A privacy breach also occurs when someone is unable to access their personal information due to, for example, their account being hacked.

If our members contact us concerned that we have been the source of a privacy breach, or if we are concerned that our own data has been breached, we will:

- 1) Tell the Privacy Officer immediately.
- 2) The Privacy Officer will work with the appropriate legal and governance oversight to decide if the breach will cause serious harm.
- 3) If yes, the Privacy Commissioner needs to be notified as soon as practicable of first learning about the breach through the [NotifyUs](#) portal.

The victims of the breach may also need to be notified.

Examples of serious harm include:

- Physical harm or intimidation.
- Financial fraud including unauthorised credit card transactions or credit fraud.
- Family violence.
- Psychological or emotional harm.