

## Dilworth Hearing Privacy Policy



Dilworth Hearing and our holding company, Amplifon S.P.A (referred to in this Privacy Policy as "we", "our", or "us") acknowledge that personal and health information about customers is given in trust and confidence, and as such, the privacy and protection of patient information are of absolute importance to us.

We comply with the New Zealand Privacy Act 1993 (the Act) and the Health Information Privacy Code 1994 (the Code) when handling personal and health information.

This Privacy Policy outlines how we collect, use, disclose and protect your personal information. It does not limit or exclude any of your rights under the Act or Code. If you wish to seek further information about your privacy rights, please visit [www.dilworth.co.nz](#) or call the Office of the Privacy Commissioner on 0800 803 909. By providing your personal information or using our services, you agree to this Privacy Policy.

We may amend this Policy at any time by uploading a revised version to [www.dilworth.co.nz](http://www.dilworth.co.nz). By continuing to provide information and use our services, you agree to any changes to this Privacy Policy.

### **1. What is personal and health information?**

Personal information is any information about you that identifies you, or by which your identity can reasonably be ascertained, such as your name, date of birth, postal and/or home addresses, telephone numbers, email address, gender, and any information provided by you in relation to the services or communications that we provide to you.

Health information, as defined by the Code, includes information about an identifiable individual's medical and treatment history, disabilities or accidents, contact with any health or disability service providers (for example, ACC), in relation to the services or communications that we provide to you.

### **2. How do we collect your information?**

We ordinarily collect information directly from our customers and suppliers, including from employees or officers of our customers and suppliers.

We collect information through, for example, online enquiries (including website and email), phone calls, written communications, and consultation appointments.

We (and our commercial partners) may also collect information from our customers' use of our products and services. This may include hearing aid usage (for example, information related to volume control adjustments, battery charging, duration of daily use, listening environments and behaviours and habits).

The type of personal information we collect on our website ([www.dilworth.co.nz](http://www.dilworth.co.nz)) depends on how you make use of the site.

When you visit the website, our host records your server address, domain name, the date and time of the visit and the pages viewed. This information may be collected by using cookies (data sent to your web browser, which generally allows our site to interact more efficiently with your computer). If you disable the use of cookies, your use of our site may be affected.

When visiting our site, you will not be required to provide us with any personal information, unless you request information about a Dilworth Hearing product or service or respond to a Dilworth Hearing promotion. In that case, we will ask you to provide contact details along with other information required to respond to your request or allow you to participate in the promotion.

The information provided may also be retained for product planning purposes and, unless you tell us that you don't want it used for direct marketing purposes, may be used for those purposes.

### **3. Why do we collect your information?**

The information we collect is for purposes relating to the products and services we offer, including:

- to provide relevant and appropriate care and treatment;
- to respond to enquiries about and improve the services and products that we provide to you;
- administration;
- to improve product development;
- information related to employment opportunities;
- providing customer support and dealing with complaints;
- to provide you with incentive rewards (both directly and in conjunction with our current partnership programmes);
- for us, or our commercial partners to implement and notify you of marketing and promotional activities, including market research, product development, and direct marketing;
- to assist with sales profiling activities for marketing and to improve our products and services;
- and
- meeting regulatory and legal obligations.

### **4. How do we ensure that your information remains confidential?**

Security of personal and health information is fundamentally important to us and we take all reasonable precautions to protect your information from misuse, loss, unauthorised access, modification or disclosure.

Some of the ways we protect personal and health information include:

- external and internal premises security;
- restricting access to personal and health information only to staff who need it to perform their day to day functions;
- maintaining technology products to prevent unauthorised computer access or damage to electronically stored information, such as requiring identifiers and passwords, firewalls and anti-virus software; and
- maintaining physical security over paper records.

If you send us an email containing personal or health information, we will take reasonable steps to ensure the confidentiality of that information. The content of emails is sometimes monitored by our internet host for maintenance and fault detection purposes. We may also monitor emails for legal compliance purposes. Emails may also be sent to our suppliers, partners or contractors when they relate to product or service enquiries or complaints. They also treat the information confidentially, but do record any health information in their in-house database.

Although we take steps to protect information sent by email, email is not a secure method of communication and, if you are concerned about sending your personal or health information to us in this manner, you may prefer to contact us by any of the other means available.

Our website may contain links to websites which are owned or operated by third parties independent of Dilworth Hearing, including websites owned or operated by Dilworth Hearing service providers. Those websites should contain their own privacy statements and their owners or operators are responsible for informing you about their security and privacy practices.

If you believe that the privacy of your personal or health information has been compromised, please let us know. You can make a complaint by contacting the person you were dealing with or by sending us an email to [info@dilworth.co.nz](mailto:info@dilworth.co.nz). We will respond to complaints as soon as possible.

#### **5. How can you access and update your information?**

Subject to certain grounds for refusal set out respectively in the Act and Code, you have the right to access your readily retrievable personal or health information that we hold and to request a correction to your personal or health information. We may ask to see evidence to confirm you are the individual to whom the personal or health information relates.

If you would like to access or correct your personal or health information, please contact us in writing. Your communication should include evidence of who you are and set out the details of your request (e.g. the personal or health information, or any corrections to such information, that you are requesting).

#### **6. How will we use your personal and health information?**

In providing you with a product or service, we may sometimes need to disclose your personal information to others. It is generally our policy not to disclose information to external organisations, however, examples of the types of organisations we may need to disclose information to in the course of providing a product, service or offer are: mailing houses for bulk mailing of letters and notices; printers for marketing material; our current incentive rewards partners, our commercial partners and other services providers. We may also disclose your information to external organisations in order to assess who our marketing is directed to and ensure our marketing remains as relevant as possible.

Those contracted and commercial parties are not authorised by us to use personal information for anything other than the purpose for which we supplied that information to them or when our commercial arrangements with those parties ends.

Sometimes, the law requires us to disclose personal information. We may also disclose personal information where the individual consents to us doing so. That consent may be written, verbal or implied from your conduct.

We may also disclose personal information where we have reasonable grounds to believe the individual consents to us doing so. That consent may be written, verbal or implied from your conduct.

Your health information will only be disclosed to others if there is a good reason to do so, in strict compliance with the Code and Act.

We will not assign a unique identifier, eg your National Health Index number, to your health information unless it is necessary to enable us to carry out our functions efficiently.

By providing your email address and/or mobile phone number, you consent to us sending you information connected with the above collection and use purposes via email or text message. The messages you receive from us will have instructions for how you can remove yourself from our mailing list if you wish.

From time to time, we (or our commercial partners) may use personal information to inform our customers about our, and our commercial partners', products and services, or about special offers and promotions that we think may be of interest to you. You can let us know at any time if you no longer wish to receive marketing material (by contacting us by any of the means set out below) and we will remove your details from our direct marketing database.

We may also use your information to improve the services and products offered to clients and to target our marketing of these products and services. We may also need to use and disclose your information to improve our services, if we are selling our business, to assist law enforcement agencies or if we are compelled to under law.

Except as stated in this Privacy Policy, Dilworth Hearing does not disclose personal information to organisations outside Dilworth Hearing, its related companies or its commercial partners for the purposes of allowing them to direct market their products. We may join with other business associates of Dilworth Hearing in joint marketing of our respective products and services to customers.

#### **7. How can you contact Dilworth Hearing Support Office?**

Phone | *09 520 7720*

Email | [privacy@dilworth.co.nz](mailto:privacy@dilworth.co.nz)

Post | *Dilworth Hearing, PO Box 100260, North Shore, Auckland 0745.*