

Faculty of Dentistry, Dental Hospital and Clinics: Privacy Statement

This privacy statement relates to personal information held by the Faculty of Dentistry in relation to its patient services. The Faculty of Dentistry complies with the Privacy Act 2020 and the Health Information Privacy Code 2020.

This statement operates alongside and subject to any privacy statements or policies that may apply to specific supplies of information made to the Faculty of Dentistry Dental Hospital. The Faculty of Dentistry is a part of the University of Otago and, as such, University [privacy provisions](https://www.otago.ac.nz/administration/privacy-information) may also apply: <https://www.otago.ac.nz/administration/privacy-information>.

Collection and use of personal information

The Faculty of Dentistry (Patient Services) collects personal information about you when you enrol as a patient, and when you attend appointments with our staff and students. We may use this information for the purposes described below and for our system administration functions, including assessing compliance with relevant policies and practices.

Where practicable all such personal information will be obtained directly from you, or your nominated agent. If all or any part of the requested information is not provided, you may not be able to access our services.

We may collect the following personal information about you:

- Your name
- Contact information (e.g., home address, email address, phone numbers)
- Date of birth
- Gender
- Your emergency contact details
- Your appointment preferences
- Your ethnicity
- Financial information (including whether you receive any forms of financial assistance, or have a community services card)
- Your occupation
- Health information (e.g., resulting from your appointments with us and any services we provide you)
- Photographs, scans, x-rays and 3D moulds to support your treatment
- Any other information we may need to contact you and to provide our services

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

Sharing and collection of personal information with/from third parties

The Faculty of Dentistry (Patient Services) sometimes collects personal information about you from third parties when it is not reasonably practicable to collect the information directly from you. This may occur where doing so is necessary for providing oral health services and care; verifying information you have supplied, accessing funding, or meeting our administrative and clinical obligations. However:

- We will only share personal information with, or collect personal information from third parties where it is necessary for our purposes, or it is permitted or required by law (including the Privacy Act and Health Information Privacy Code 2020).
- We will only ever share or collect the minimum amount of personal information needed to meet our purposes.

- We will always ensure that appropriate privacy protections are in place for any personal information shared or collected.
- Where we have concerns about your health or wellbeing or the health or wellbeing of others as part of our oral health care role we may share your personal information with your nominated emergency contact person, your family/whanau, your healthcare provider or other organisations we believe need to know to keep you and/or others safe, and
- in the event of an emergency (or if we have serious concerns about your wellbeing), police, medical or hospital personnel, civil emergency services, your legal representative or nominated emergency contact person, your embassy or consulate if you are a visiting student, or any other person assessed as necessary to respond to the emergency.
- It is noted that personal information we collect from an external agency will not normally be provided to a third party without your consent, unless a relevant exception under the Privacy Act applies.

The sources from which we may collect information include (but are not limited to):

- Your medical or dental practitioners
- Health New Zealand, Te Whatu Ora
- Accident Compensation Corporation (ACC)
- Ministry of Social Development (MSD)
- Oral Health Community Hubs
- Corrections facilities
- Interpreter Services
- Residential care facilities
- High Schools (for patients under 18 years of age)
- Other healthcare providers or referral agencies
- Credit Recoveries Limited (for payment-related functions)
- Public sources (e.g., death notices)

Disposal of personal information

Storage of personal information is managed in accordance with the policies and procedures of the University of Otago Cyber Security Framework.

Paper records of data, including hard copies, are scanned and archived. Hard copy originals are then housed in secure storage. The University's Corporate Records team ensure compliance with requirements under the Public Records Act and the New Zealand Universities' General Disposal Schedule.

We will endeavour to not keep any personal information about you for longer than is necessary to provide our services, noting that it may be necessary to retain your health information for the purposes of providing you with health services in the future.

Security of personal information

Personal information will be stored on University of Otago files and databases and we will take all reasonable steps to keep personal information safe and secure, and to ensure that it is protected against loss or unauthorised access, modification, use or disclosure. In some instances, personal information may be transferred, and held, by service providers in New Zealand and overseas (including, for example, where it is stored using a cloud-based service). Where this occurs, we will do everything reasonably within our power to ensure that the service provider also has reasonable security measures in place to protect personal information.

We will not transfer your personal information to a foreign person or entity (including an overseas-based service provider) unless:

- a) we reasonably believe that the foreign person or entity has obligations to protect personal information in a way that is comparable to the protections afforded by the Privacy Act 2020; or
- b) you authorise the disclosure of your personal information after being expressly informed that the foreign person or entity may not be required to protect your personal information in a way that, overall, provides comparable safeguards to those in the Privacy Act 2020; or
- c) it is not reasonably practicable in the circumstances for us to comply with (a) and (b), and we believe on reasonable grounds that disclosure of the personal information is necessary as permitted under the Privacy Act 2020.

Disclosure of personal information

Staff members and other personnel within the Faculty of Dentistry, including Faculty of Dentistry students, will have access to personal information for purposes relevant to our normal operations and to provide our services.

Your personal information will not be disclosed to third parties without your consent unless the use is within the scope of the purposes for which the information was collected. Our staff and students may share information where required for their administrative and clinical functions.

Our students may also discuss your case with other students or staff members within the Faculty of Dentistry for training and education purposes. However, our students are required to anonymise your personal information where you are not also known to the other student/s or staff member/s in question. Our staff and students are also subject to a Confidentiality and Privacy Agreement, which requires them to protect your personal information.

Other than stated above, we do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. We have taken steps to ensure that each partner or third party involved treats personal information in accordance with the Privacy Act 2020.

Your Rights

We will make personal information held about you available to you upon request and in accordance with the Privacy Act 2020. The Privacy Act 2020 describes the conditions under which some personal information may be withheld.

You have the right to request correction of personal information held in accordance with the provisions of the Privacy Act 2020. If you would like to do this, please email dental.records@otago.ac.nz.

If you are concerned your privacy has been breached by the Faculty of Dentistry (Patient Services), you may make a complaint to dental.consumerrelations@otago.ac.nz. You also have the right to make a complaint to the University's Privacy Officer at registrar@otago.ac.nz, and the Office of the Privacy Commissioner. You can contact the Office of the Privacy Commissioner at www.privacy.org.nz.

We will notify you as soon as practicable if there is a privacy breach in relation to your personal information that we reasonably believe has caused or is likely to cause you serious harm, unless one of the exceptions under the Privacy Act 2020 applies. The University will also notify the Privacy Commissioner as soon as practicable if there is such a breach.