

# Privacy Statement

April 2024

## Introduction

This privacy statement explains how Umbrella Wellbeing Limited (“Umbrella”) collects, stores, uses and shares your personal information.

Openness and transparency are important to us. The Privacy Act 2020 requires us to tell you certain things about the personal information we need to operate our business. This is where we explain our privacy practices and why you can trust us to handle your information with care and respect.

Umbrella Wellbeing is a subsidiary of New Zealand Health Group (NZHG) and there will be limited times when NZHG staff will have access to personal information collected and held by us. This statement will explain when those instances will occur.

We have categorised our services into three broad groups: Wellbeing Assessments, Professional Services (including EAP), and General Engagement. Under these groups, we explain what personal information we collect and how we use or share it. We also explain the way we store and protect personal information and your rights to access and correct it. At the end of this statement, we also provide information about our storage and security procedures, your privacy rights and how to contact us, or lodge a complaint regarding our privacy practices.

In short, here are a few key privacy messages to note:

- We collect personal information only where this is necessary to provide our services
- We may collect personal information about you either directly from you or from other people or organisations, and we may generate personal information about you (such as notes taken during face-to-face sessions) when we provide our services
- We store all our data (including your personal information) on secure platforms including Microsoft Azure, AWS and PowerDiary. We also use Microsoft Office 365 applications. We protect our data with all reasonable technical and process controls.
- You can ask us for a copy of your personal information at any time. We will be as open as we can with you
- We will use and share personal information only where it is necessary to carry out the functions for which we collected it, or if required or permitted by law (including where it is necessary to lessen a threat to the health or safety of any person.)

If you cannot find the information you need below, or you have concerns about the way we are managing your personal information, then please contact us at any time.

We may update this privacy statement from time to time, for example to reflect changes to the Privacy Act, so feel free to check in again occasionally to see what might have changed. This statement was last updated in January 2024.

## 1. Wellbeing Assessment

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This section explains how we collect, use and share personal information when we are conducting the Umbrella Wellbeing Assessment.

### 1.1. The personal information we collect about you

Conducting our Wellbeing Assessment requires collecting individual information.

#### 1.1.1. From your organisation

Your organisation will provide names and email addresses so Umbrella can send out invitations to participate.

#### 1.1.2. From you directly

The personal information we may collect from you directly includes:

- demographic information (e.g. age and gender)
- self-reported wellbeing, resilience, stressors and psychological distress
- self-reported evaluations of your workplace

Providing personal information by participating in the Wellbeing Assessment is optional. If you choose not to participate in the assessment, we will be unable to provide you with a personalised wellbeing report with resources to improve your wellbeing.

#### 1.1.3. Generated by us as we carry out professional service-related functions

In the course of conducting our Wellbeing Assessment we generate information about you.

- your own individual wellbeing report (accessible only by you)
- high-level anonymised wellbeing reports provided to client employer organisations (more information on this below)

### 1.2. What we do with your personal information

#### 1.2.1. How we use it

In order to carry out our Wellbeing Assessment, we need to use your personal information in the ways set out below. Where we need to use information in a way we have not anticipated, we will only do so if required or permitted by law or with your authorisation.

We may use your personal information to:

- send out invitations and track who has completed the survey so we can provide you with your individual wellbeing report, and send reminders to complete the assessment
- provide a high-level anonymised wellbeing report to each organisation, in order to design initiatives to support the wellbeing of their people. These reports do not identify any individuals.
- identify high-level wellbeing trends over time in each organisation if an organisation chooses to run the assessment across multiple time-points
- prepare anonymised summary reports for research purposes, to share with the wider research and corporate communities (e.g. through journal publications)
- respond to your requests for technical support in completing the assessment or accessing your report
- email you with relevant resources for you to voluntarily seek help/support



Any personal information you provide is held confidential to Umbrella Wellbeing Ltd and is not provided to your employer or any other person or agency, unless authorised by you or required or permitted by law. We keep personal information safe by storing it in encrypted files and allow only staff with a legitimate need to access it to provide our services to you. Individual accounts are kept active so that you can go back and review your wellbeing reports at any time.

Aggregated information from your assessment is used to prepare an organisation summary report and/or be published in a research report. All data is anonymised, and care is taken to ensure no individual can be identified from the data in these reports. This means that neither your employer, nor anyone else, is able to identify your responses from these reports.

### 1.3. When we share it

We may share aggregated and anonymised personal information with:

- Our client organisations for the purposes of understanding patterns and challenges to the wellbeing of their people.
- Our staff and contractors for the purposes of research, analysis, quality control and program development.

## 2. Professional Services

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This section explains how we collect, use and share personal information when we are providing professional services. These include:

- counselling,
- psychological support
- training (including overviews and workshops)
- coaching
- supervision, and
- consultation.

### 2.1. The personal information we collect about you

Our professional service delivery requires us to collect personal information. We may request, receive and use sensitive personal information, including health information, as follows:

#### 2.1.1. From you directly

Most of the personal information we collect is provided directly by you, or people you authorise us to contact, when you engage with us and our services.

Engaging with this service is voluntary and you do not have to provide your personal information to us.

However, we may not be able to effectively provide you with services (such as providing support, counselling or psychological assistance) if you do not provide us with the information we need.



The personal information we may collect from you directly includes:

- your name
- your contact details, including your address, email address, phone number
- Your date of birth
- Your gender and cultural identities
- information in relation to the reason you have sought our service
- information about your employment, such as your organisation, team or role
- information about your business, service or organisation
- your response to self-assessments, tests or questionnaires
- any documents or other information you provide to us as part of our service delivery
- details of your health conditions
- contact details for your general practitioner and emergency contacts (for clinical services)
- your responses to satisfaction/feedback/evaluation surveys we ask you to complete

### **2.1.2. From another person or agency**

Our professional services related functions may also require us to receive or request personal information about you from your employer or contracting organisation.

We may collect personal information from the following people or agencies:

- Your employer (or contracting organisation) such as your role and contact details. This enables us to begin to see where you fit in the organisation and contact you about the services we are providing to your employer.
- Other persons who you have nominated and provided permission or consent for us to contact during the informed consent process (clinic clients only).
- Any agency in a situation where we believe sharing information is necessary for the safety of tamariki or to stop and prevent family violence.

We may also collect publicly available information about you – such as any media reports – where this is relevant to carrying out our professional service functions, for example if we want to understand more about someone we are engaging with who has a public profile.

### **2.1.3. Generated by us as we carry out professional service-related functions**

In the course of providing our services we may generate information about you.

The personal information we may generate about you includes:

- file notes, memoranda, meeting minutes or other records of observations or actions taken
- professional assessments
- interpretation of test/assessment results
- reports provided to client organisations (more information on this below)



## 2.2. What we do with your personal information

### 2.2.1. How we use it

In order to carry out our professional service functions, we need to use your personal information in the ways set out below. Where we need to use information in a way we have not anticipated here, we will only do so if required or permitted by law or with your authorisation.

We may use your personal information to:

- contact you about a concern for your welfare or the welfare of someone else
- provide you with relevant reports, resources and referrals
- provide you with technical support including access information for remotely / digitally provided services
- provide your employer (or contracting organisation) with relevant reports, resources and other information. Note that any information and reporting identifying you can be done only with your prior consent. Other reporting (non-individual) will be aggregate and anonymised.
- measure, review and improve the delivery of our services, including conducting satisfaction surveys
- conduct internal statistical analysis and reporting
- provide anonymised reporting of themes to our client organisations
- invite you to register for events or training

### 2.3. When we share it

We do not share your personal information with third parties (other than third parties which are providing services to us). However, we may share your individual personal information in the following circumstances:

- In limited circumstances where Umbrella practitioners are unavailable, we may use other suitably qualified practitioners from other NZHG Mental Health Wellbeing subsidiaries to provide a service to you. In these instances, the practitioner would have access to some personal information such as your name and contact details in order to contact you and provide the service to you.
- We may need to share your personal information with the NZHG privacy officer to properly respond to any Privacy Act request, query or complaint made by you.
- With your GP (with your prior consent) for the purposes of providing clinical supports.
- With any other relevant individual or agency where we believe it is necessary to lessen or prevent a serious risk to you or any other person's health or safety.
- Your employer or contracting organisation (with your prior consent) for the purposes of providing feedback on support in the workplace, psychological assessment or report.
- Your nominated person (with your prior consent) for the purposes of assisting with or being informed about their assessment and treatment.
- Where we are required to do so by law.

We may share aggregated and anonymised personal information with:

- Our client organisations for the purposes of understanding the wellbeing of their people.
- Our staff and contractors for the purposes of research, analysis, quality control and program development.



## 3. General Engagement

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This section explains how we collect, use and share personal information when we are engaging with the public and with organisations, including managing our enquiries function, delivering e-learning services, and otherwise engaging with the community through our website or communications activities (such as events, surveys, and newsletters).

### 3.1. The personal information we collect about you

Effectively engaging with the public requires us to collect and use some personal information. However, we only collect the personal information you choose to give us (for example, you decide how much detail to provide us as background to an enquiry), and you can opt out of our communications activities, such as receiving our newsletter, at any time.

The information we may collect when you engage with us includes:

- your name (if you choose to provide it)
- your contact details, including your address, email address or phone number
- your organisation and role
- the content of your enquiry
- any questions or comments you submit via our website or social media
- details of any events you have registered for, including dietary or other specific requirements
- your responses to surveys or focus group discussions (usually these will be captured in a de-identified form)
- your e-learning results
- information about your use of our website (explained further below)

Where your browser settings permit, we collect the following information about your use of our website (though please note we make no efforts to associate this with your identity)::

- your IP address
- the search terms you used
- the pages you accessed on our website and the links you clicked on
- the date and time you visited the site
- the referring site or medium (if any) through which you clicked to our website
- your operating system (such as Windows 10)
- the type of web browser you use (such as Mozilla, Firefox)
- your general location and type of device/operating system



## 3.2. Links to social networking services

We use social networking services such as LinkedIn and YouTube to communicate with the public about our work. When you communicate with us using these services, the social networking service may collect your personal information for its own purposes.

These services may track your use of our website on those pages where their links are displayed. If you are logged in to those services (including any Google service) while using our site, their tracking will be associated with your profile with them.

These services have their own privacy statements which are independent of ours. They do not have any access to the personal information we hold on our systems.

## 3.3. What we do with your personal information

### 3.3.1. How we use it

We will only use the personal information you provide to us for the purposes of delivering the services you have requested (such as registering you for an event, responding to an enquiry or sending you our newsletter).

We may use your personal information to:

- contact you about your request, query or registration
- let you know about new services you may be interested in
- send follow-up information to people attending our events
- consider and respond to your enquiry
- improve our website and the delivery of our online services
- conduct internal statistical analysis and reporting

### 3.3.2. When we share it

We do not share your personal information with third parties (other than third parties which are providing services to us). However, we may share your personal information, if necessary, to appropriately respond to your enquiry e.g., we may need to share your personal information with the NZHG privacy officer to properly respond to a Privacy Act request, query, or complaint.

We may share personal information with the Police or another government agency, if required by law (for example to assist with the investigation of a criminal offence), to report significant misconduct or breach of duty, or where there is a serious threat to health or safety. If our staff are threatened or abused, we may refer this to the Police.

## 3.4. Third Party Providers

We use some third-party providers to manage some of our processes and services, such as newsletters, events registration, video conferencing and e-learning. Where we do this, any personal information you provide (such as your email address) may also be collected and stored by this provider and you should also check their privacy statements when using those services. We take steps to ensure that any providers we use can protect the personal information they process for us.



## 4. Storage and security

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### 4.1. Storage and retention

We use third party providers to store and process our data.

We store most of the personal information we collect and generate electronically on Microsoft Azure and AWS cloud servers located in Australia. We also use Microsoft Office 365 for our email and other office productivity applications. Wellbeing Assessment data is collected and hosted at Amazon web services and email delivery for the Wellbeing Assessment uses Amazon SES. This means that the personal information we hold may be transferred to, or accessed from, countries other than New Zealand.

We also use Zoom and you can view their privacy statement [here](#).

We retain personal information in compliance with the requirements of the Public Records Act 2005.

### 4.2. Security

We take all reasonable steps to ensure the personal information we collect is protected against loss, unauthorised access and disclosure or any other misuse, including meeting the requirements prescribed by the New Zealand government for the secure handling, storage and disposal of any protectively marked or security classified information.

We ensure that our third-party data processors can meet our privacy and security requirements.

We are satisfied, for example, that Microsoft has adequate 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 [www.microsoft.com/en-us/trustcenter](http://www.microsoft.com/en-us/trustcenter).

## 5. Your privacy rights and how to contact us

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The Privacy Act 2020 gives you rights to request access to and correction of the personal information we hold about you. You can also complain to us at any time if you think we have misused your personal information.

### 5.1. Requesting access to or correction of your information

You have the right to make a request for access to the personal information we hold about you. You also have the right to ask us to correct your information if you think it is wrong. Both requests can be made in any form. We respect your privacy rights and will attend to your requests in accordance with our obligations under the Privacy Act 2020.

We will process your request as soon as possible, and no later than 20 working days after we receive it. We will be as open as we can with you.

### 5.2. Opting out of certain uses of your information

#### 5.2.1. Engagement information

You can opt out of receiving our newsletter or being included on any other subscription list or news feed by following the unsubscribe link at the end of the email or contacting us. You can opt out of our cookies when you use our website by changing your browser security settings.





## 5.2.2. Wellbeing Assessment Participation

Providing personal information by participating in the Wellbeing Assessment is optional. If you choose not to participate in the assessment, we will be unable to provide you with a personalised wellbeing report with resources to improve your wellbeing.

To exercise any of these rights, including the right to complain about our privacy practices – see below - please contact us by:

- emailing Dr Jeremy Robertson (Umbrella's Privacy Officer) at [jeremy@umbrella.org.nz](mailto:jeremy@umbrella.org.nz)
- calling us on 0800 643 000
- writing to us at PO Box 24 445, Manners Street, Wellington 6142

## 6. Complaints regarding our privacy practices

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We want to know if you have concerns about our privacy practices, as this allows us to try and put things right for you and helps us to identify and fix any problems with our systems or processes.

In the first instance, let us know about your concerns and we will try our best to resolve it.

If we cannot resolve your concerns, then you have the right to complain to the Privacy commission:

<https://www.privacy.org.nz/your-rights/making-a-complaint/>