

**Immunisation Advisory Centre (IMAC)  
PRIVACY POLICY**

**1 Introduction**

The Immunisation Advisory Centre (**IMAC**) is a business unit within Auckland UniServices Limited. UniServices is the wholly owned subsidiary of the University of Auckland.

IMAC is funded by the Ministry of Health to provide:

- New Zealanders with independent, factual information about vaccine-preventable diseases and the benefits and risks of immunisation;
- training for health professionals;
- national immunisation coordination; and
- immunisation policy advice and research.

As part of this work, we offer professional development opportunities to the vaccinator workforce through events, face-to-face training and e-learning courses. More information about the courses and other services we offer can be found here: [www.immune.org.nz](http://www.immune.org.nz)

IMAC also carries out research activities involving individuals.

This Privacy Policy sets out generally how IMAC collects, uses, stores and discloses personal information. We may include more details of how we handle personal information for each of our specific services in additional privacy statements and/or information provided to you in connection with that service. Any such additional privacy statements should be read in conjunction with this Privacy Policy.

**2 Changes to this Privacy Policy**

From time to time, we review and may update this Privacy Policy and/or any additional service-specific privacy statements. Updates are uploaded to the Website and take effect from that date.

It is your responsibility to ensure that you are aware of the most recent version of this Privacy Policy and any Service-specific privacy statement(s).

This Privacy Policy was last updated on **18 May 2021**.

**3 Definitions**

- a **DHB** means a District Health Board.
- b **IMAC** means the Immunisation Advisory Centre, a UniServices Business Unit, primarily located at Building 507, 22–30 Park Avenue, Grafton, Auckland, New Zealand.
- c **Ministry** means the Ministry of Health, who fund us to provide many of our Services.
- d **personal information** has the meaning given under the Privacy Act. Generally, it means information about an identifiable individual.
- e **Privacy Act** means the Privacy Act 2020 or any replacement legislation.
- f **Privacy Policy** means this *Immunisation Advisory Centre Privacy Policy*, as updated from time to time.

- g **Services** means our courses, events, the 0800 IMMUNE phone line, and other initiatives that we provide. Details of these can be found on our Websites.
- h **UniServices** means Auckland UniServices Limited, a New Zealand company of Level 10, 49 Symonds Street, Auckland, company number 373821.
- i **University** means the University of Auckland, a body corporate established under the University of Auckland Act 1961 and the Education Act 1989, of 22 Princes Street, Auckland, New Zealand.
- j **Websites** include [www.immune.org.nz](http://www.immune.org.nz), [www.influenza.org.nz](http://www.influenza.org.nz) and [lms.immune.org.nz](http://lms.immune.org.nz).

#### 4 Collection of Personal Information - Who

We collect personal information in a number of different ways, depending on the nature of your engagement with us. Generally, we collect personal information about the following types of people:

- a health professionals and trainees in the health sector who access our Services for training and development, including our online learning courses and webinars;
- b health professionals and members of the public who contact us via our 0800 IMMUNE phone line for advice on immunisation and vaccination-preventable diseases;
- c participants in research studies; and
- d other individuals who access our resources, browse our Websites or register to receive our newsletters.

#### 5 Collection and Use of Personal Information – Training and Development

Where you engage with us as a health professional or trainee for the purposes of training and development, we collect and use your personal information in the following ways:

- a When you register your interest in our courses, we collect name, physical address, affiliated DHB or other affiliated organisation, email address, contact phone numbers, your current role/occupation and organisation of employment, and other information that you choose to provide to us (for example, health practitioner registration details, ethnicity).
- b We also collect information about you from other sources, including your affiliated DHB/organisation or the Ministry, where you have been nominated by your affiliated DHB/organisation or Ministry to attend one of our courses.

We use the information you provide, in conjunction with information provided to us by others, to:

- a verify who you are and the accuracy of any information you have provided (for example, name spelling, identity, qualifications or role you hold);
- b prevent multiple profiles being created for the same person, so that we can effectively liaise with DHBs/other affiliated organisations and the Ministry in helping coordinate national immunisation strategies;
- c determine your entitlement to enrol in the course in which you are interested;
- d prioritise enrolments where directed to do so by the Ministry (for example, nurses intending to provide immunisations for the Ministry's requirements under the New Zealand National Immunisation Schedule are prioritised for

- relevant courses) or where spaces are limited and you have unsuccessfully attempted to pass the course a number of times previously;
- e provide our courses to you for which you are enrolled; and
- f record your attendance and completion of our courses, and to assess your eligibility for accreditation.

As part of your course completion, your work may be required to undergo peer review. We use the information received from those reviewers to assess your completion of the course and entitlement to accreditation.

If you choose not to provide information that we have indicated is mandatory, or if we are unable to verify the accuracy of any information you provide, we may be unable to register your interest or enrolment for the course you are hoping to undertake.

## **6 Collection and Use of Personal Information – Health Consumers**

Where you engage with us as a member of the public with questions or queries about your own health, we will not ask you to provide identifying information. However, if you choose to provide this, we may retain this information, along with the other information (including health information) that you provide. We may use this information (although we will de-identify it where possible) for the purposes set out elsewhere in this Privacy Policy.

## **7 Collection and Use of Personal Information – Participants in Research**

IMAC carries out research involving individuals as participants. We carry out our research either ourselves or in collaboration with our research partners. We also support third party researcher efforts to recruit participants for their research where relevant to our activities. As part of these activities, where you have engaged with us as a health professional or trainee, or you have otherwise consented:

- a we may contact you separately to ask if you would like to participate in any research studies that we or our research partners are undertaking; and/or
- b we may share your contact details with third parties who are seeking suitable candidates to participate in research studies,

and in each case:

- c we will use or share your information in this way only where relevant to the nature of your engagement with us and in accordance with required ethical standards;
- d if you do not wish to be contacted about participating in research studies, please let us know by [contacting us here](#); and
- e where you choose to engage with us or our research partners as a participant in a research study, more information on how your personal information will be handled will be set out in the participant information sheets and consent forms provided to you as part of that process.

## **8 Collection and Use of Personal Information - Other**

We also collect and use personal information for the following purposes:

- a we record calls made to our 0800 IMMUNE phone line, for training and quality assurance purposes;
- b administrative purposes, including to correspond with you;
- c we may contact you as part of our quality assurance activities to ask about the quality of your experience in using our Services;

- d evaluating our own performance, and the impact of our Services on health and other social sectors, both for our own purposes and as part of our commitments to the Ministry; for example, we use ethnicity, occupation and location to monitor the reach and uptake of our Services across different demographics to assess if we are effectively reaching intended audiences;
- e marketing and related purposes, as set out below in clause 14c;
- f health and safety purposes, for example, where you attend one of our courses on-site;
- g facilitating communications between you and other members of professional interest groups for which you have registered;
- h other purposes for which you have given us your consent, for example, where you have provided consent to your affiliated DHB/organisation to access your course-related information for their purposes; or for example, where you consent to us posting an image or video of you on our website or Facebook page; and
- i other reasons permitted under the Privacy Act.

## **9 Disclosure of Personal Information**

We may share personal information with the following persons and organisations:

- a the University, but only to the extent necessary to enable us to fulfil our other purposes as set out in this Privacy Policy;
- b our research partners, and third-party researchers, as set out in clause 7;
- c our third-party service providers, as set out in clause 10;
- d with your affiliated DHB/organisation and the Ministry, where you have successfully completed one of our courses, for the purposes of feedback and/or employment opportunities relevant to your qualification;
- e the Ministry, where you engage with us as a health professional or trainee for the purposes of training and development, to support workforce planning, accreditation verification, and in accordance with our reporting and other contractual commitments to the Ministry; and
- f other reasons permitted under the Privacy Act; for example, we can be required under section 22G of the Health Act 1956 to disclose information to the Ministry, DHBs or other health agencies, to support a claim for payment that we have made from that health agency in connection with a course you have undertaken with us.

## **10 Storage and Security of Personal Information**

- a We take reasonable security safeguards to ensure that your personal information is protected against unauthorised loss, access, use, modification, disclosure and other misuse, but it is not possible to guard against every risk of misuse.
- b We use trusted third party providers to store information and/or to use their applications and other tools for our own purposes, for example:
  - i Koda Web Limited of Auckland, New Zealand host our Website;
  - ii we use Mailchimp to assist with electronic communications; Mailchimp's own security policy (including privacy) is set out here: <https://mailchimp.com/about/security/>; and

- iii our third party payment providers when you pay for any of our Services; note that we do not hold your credit card or bank account details.
- c We store personal information only for as long as we need it or are required by law to keep it. Paper records are securely destroyed using our trusted third party provider, Iron Mountain.

## **11 Your Rights to Access and Request Correction of Personal Information**

- a You can:
  - i ask us to confirm what personal information we hold about you;
  - ii request access to and correction of your personal information; and
  - iii provide us with a statement of correction to attach to your personal information if we choose not to correct your personal information.
- b We may choose not to provide you with access to your personal information for certain reasons set out in the Privacy Act, for example, where:
  - i to do so could disclose information about another individual;
  - ii to do so could endanger the health or safety of an individual or the public; or
  - iii the information is protected by legal professional privilege.
- c If we provide access to your information, we may provide you with a copy, extract or summary of that information. For example, if we hold health records about you, we are legally required to retain health records and are not generally able to hand over original records.
- d If you wish to exercise any of your rights under the Privacy Act, please contact us at [imacprivacy@auckland.ac.nz](mailto:imacprivacy@auckland.ac.nz) You will need to:
  - i clearly state your request and that it relates to information potentially held at IMAC;
  - ii tell us who you are and provide reasonable evidence of your identity if we ask; and
  - iii tell us if (and why) your request is urgent.

## **12 Keeping Your Information Up-to-date**

It is important that any contact details we hold about you are kept up-to-date. For example, we may need to contact you urgently if we suffer a security event such as unauthorised access or disclosure of your personal information. So we can contact you, please keep your profile up-to-date on the relevant website that holds your information, (for example [lms.immune.org.nz](https://lms.immune.org.nz)).

Where we identify discrepancies or potential errors with your information, we will take reasonable steps to contact you directly to verify (and if necessary correct) the accuracy of the information we hold about you. In isolated instances, we may need to make a correction to information we hold about you even though we have been unable to verify this with you directly, where it is necessary to ensure that we can effectively liaise with your affiliated DHB, the Ministry or other relevant organisation, as part of our role in helping coordinate and deliver national immunisation strategies.

## **13 UniServices and the University**

As the wholly-owned subsidiary of the University, and in occupying some sites within the University campus, UniServices and the University share some resources including IT systems.

## **14 Marketing**

- a We do not sell your personal information to third parties for their marketing or other purposes.
- b Where you have signed up to be on our mailing list or have otherwise provided us with your consent, we may send you information about our Services, and/or events and services of our third party partners, including via email and other electronic messaging. You have the right to unsubscribe from those communications.
- c We may also use the information you have provided to us, along with our administrative and training records and information provided to us by DHBs/other organisations and the Ministry, to help identify suitable candidates for our other courses, particularly, where there is a public health need to increase the numbers of health professionals qualified under that course (for example, to identify suitable candidates for training to be a Covid-19 vaccinator or administrator). We may contact you using your contact details to invite you to participate in such a course.
- d We or others may contact you to see if you would like to participate in certain research studies, as set out above in clause 7.

## **15 Cookies and Website Access**

- a Cookies are very small text files that are sent to your browser or device from our web server and stored on your computer/device hard drive. The text file is sent back to the server each time the browser requests a page from the server. We use cookies and similar digital tracking tools to help remember users and monitor how they interact with our Websites. For example, we may use cookies to authenticate users, remember user preferences, and determine website traffic and trends.
- b Cookies cannot damage files, nor can they read information from the hard drive of a computer. You can disable the acceptance of cookies by adjusting the settings in your web browser, although this may restrict your ability to access some areas of our Websites.
- c When you visit and access our Websites, the IMAC server typically collects:
  - i your browser's internet address;
  - ii your server's address;
  - iii your domain name;
  - iv your IP address;
  - v the date and time of your visit to the site;
  - vi the pages you accessed and documents downloaded;
  - vii the previous site visited;
  - viii the type of browser you are using; and
  - ix the username entered if accessing a restricted site.

IMAC uses this information for statistical purposes and for system administration tasks to maintain the Websites. IMAC does not attempt to identify individuals as part of regular business practice.

## **16 Covid-19 - Vaccines and Your Privacy**

We do not collect records of Covid-19 vaccinations, other than anonymised records provided to us by the Ministry for training purposes and/or to help inform our policy advice. The Ministry manages the Covid-19 vaccine programme and has provided information on Covid-19 vaccines and privacy on its website at <https://www.health.govt.nz/our-work/diseases-and-conditions/covid-19-novel-coronavirus/covid-19-vaccines/covid-19-getting-vaccine/covid-19-your-privacy-when-getting-vaccinated>.

## **17 Your other Privacy Rights**

- a If this Privacy Policy has not answered your questions as to how we collect, use, store and share your information, please contact us at [imacprivacy@auckland.ac.nz](mailto:imacprivacy@auckland.ac.nz)
- b If you have concerns that your privacy rights have been breached, you can:
  - i contact us with your concerns at [imacprivacy@auckland.ac.nz](mailto:imacprivacy@auckland.ac.nz) or [privacy.officer.uniservices@auckland.ac.nz](mailto:privacy.officer.uniservices@auckland.ac.nz); and/or
  - ii lodge a complaint with the Office of the Privacy Commission. See <https://www.privacy.org.nz/your-rights/making-a-complaint/> for more information.