Otago Total Mobility privacy statement

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Otago Regional Council	**Document Name:** Total Mobility Privacy Policy
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1. Purpose

Your privacy is important to Otago Regional Council (referred to in this Privacy Policy as "we," "our" or "us"). This Privacy Policy is for the control of our collection, use and disclosure of your personal information as defined in the Privacy Act 2020 (Privacy Act) and has been prepared in accordance with our obligations and your rights set out in the Privacy Act.

We collect personal information to administer the Total Mobility Scheme, assess eligibility, fulfil contractual and funding obligations, and improve the delivery of the scheme.

2. Scope

This policy applies to the Otago Regional Council Total Mobility scheme. It may be necessary to depart from this policy if any of the exceptions in the Privacy Act apply.

Please note we may change this Privacy Policy from time to time.

3. Policy Content

The personal information we collect may include your name, date of birth, addresses, email address, telephone numbers, gender, and information on your use of the Total Mobility scheme and any additional information provided by you or on your behalf in connection with the Total Mobility scheme.

3.1 Collecting your information

In accessing the Total Mobility scheme, we collect personal information about you through the eligibility assessment. We will take steps to ensure you are aware that the information is being collected and the reasons for doing so.

Sensitive personal information, including information about mobility and accessibility requirements, may be provided directly by you or on your behalf through an approved assessment agency. This information is stored and managed within the RideWise Total Mobility administration system, which is hosted in New Zealand.

Such Personal Information may also be disclosed to other third parties if required by law.

We collect personal information including:

(a) Name, address, date of birth, and contact details

(b) Photograph for your Total Mobility card

(c) Information about your disability, impairment, mobility needs, use of mobility aids, and eligibility for the scheme

(d) Statistical information including; gender, age, ethnicity and employment

(e) Trip and usage information relating to your use of the Total Mobility Scheme

(f) Information relating to complaints, reviews, appeals, or investigations

3.2 Using your information

The personal information that we collect from you or someone acting on your behalf may be used for any of the following purposes:

(a) Assess and confirm eligibility for the Total Mobility Scheme

(b) Issue and manage your Total Mobility card

(c) Process and verify subsidised trips

(d) Prevent fraud and misuse of the scheme

(e) Meet audit, reporting, contractual, and legislative requirements

(f) To update your contact details

(g) To respond to correspondence or provide you with information you have requested.

(h) To investigate any complaints with the related Transport Operator

(i) information from the mobility assessment will determine eligibility and may be used for anonymous statistics and research which will not identify any Total Mobility users

(j) To comply with relevant laws and regulations.

3.3 Sharing your information

We may disclose personal information about you to:

(a) Any person you authorise us to disclose your personal information to.

(b) Approved Total Mobility assessment agencies

(c) Approved Total Mobility assessors

(d) Approved Total Mobility transport operators where required to provide services

(e) ORC employees, contractors, and service providers who require access to administer the scheme

(f) NZ Transport Agency Waka Kotahi (NZTA) for programme administration, funding, monitoring, and audit purposes. Public transport authorities are required to supply information to NZTA when requested.

(g) May be used for anonymous statistics and research which will not identify Total Mobility card holders

(h) Audit New Zealand or similar Crown entities may access the information for oversight, reporting and audit and;

(i) A third party if we are required to do so under any laws or regulations.

3.4 What if you do not provide us with the personal information requested?

If you do not provide us with all of the personal information that we request from you, we may not be able to approve eligibility to the Total Mobility scheme, adequately respond to your correspondence, or deal with any requests you have submitted.

3.5 Security and accuracy

We take reasonable steps to ensure personal information is:

(a) Protected against loss, damage, misuse, and unauthorised access. We restrict access of personal information to those individuals who need access to this information to assist us in performing our duties and obligations

(b) accurate, up to date, complete, relevant, and not misleading.

3.6 How long we hold personal information

We may retain all personal information that we collect (on both our active systems and our archive systems), for as long as administratively necessary, in accordance with the council's information retention and disposal schedule. The Public Records Act 2005 requires us to retain "protected records" indefinitely.

If your Total Mobility card has not been used in-taxi within three years, you no longer require access to the Total Mobility Scheme, no longer meet the eligibility criteria, or you relocate outside of Otago, your account will be cancelled. Personal information associated with your account will be anonymised from our administration system three months following cancellation.

3.7 Accessing and correcting your personal information

You may request confirmation of whether we hold any personal information about you. You may request access to the personal information that we hold about you by emailing us at legal@orc.govt.nz. Once we have verified your identity, we will provide you with such confirmation and access unless one of the grounds for refusal to do so under the Privacy Act applies.

You may request that the personal information we hold about you be corrected by emailing us at legal@orc.govt.nz. If we agree that your personal information is to be corrected, if requested we will provide you with an amended record of your personal information. Your rights of access to and correction of any personal information we hold about you are subject to the procedures set out in the Privacy Act.

4. Terms and Conditions

Please also visit our Terms and Conditions on the ORC Total Mobility webpage.

5. Relevant Documents

- Privacy Act 2020
- Public Records Act 2005

6. Who you can contact for further information

If you have any queries about this Privacy Policy or personal data Otago Regional Council has collected, please contact: Otago Regional Council Privacy Officers Email address: legal@orc.govt.nz

If Otago Regional Council can't resolve your concerns, you have the right to complain to the Office of the Privacy Commissioner, by following the steps set out at www.privacy.org.nz.