

Interweave Integration Limited Privacy Statement

Updated and effective as of 15 January 2025

1. About our Privacy Statement

Interweave Integration Limited values and respects the confidentiality of information provided by our customers. We are committed to protecting the privacy of patients, staff, and others for whom we hold data, adhering to the Privacy Act 2020 (NZ) and complying with the Information Privacy Principles (IPPs) set by the New Zealand Government for handling Personal Information under the Privacy Act.

Our objective is to ensure that all data accessed by Interweave Integration Limited or uploaded into our servers is kept secure, in accordance with the principles outlined in this Privacy Statement.

This Privacy Statement also details our response to unauthorised access, data breach, or suspected data breaches.

This Privacy Statement addresses common questions from individuals and customers engaging with us and using our services.

2. What is Personal Information?

Under the Privacy Act 2020, “Personal Information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identifiable individual or an individual who is reasonably identifiable. This includes information or an opinion that personally identifies you (or another person) either directly (e.g., your name) or indirectly.

3. What Personal Information do we collect?

3.1 Contact Information

We collect contact information of our customers, users, and other people we need to contact to operate our business and services.

3.2 De-identified Claims and Related Data

We may collect de-identified data related to billing and other user data as detailed in our service documentation.

3.3 Patient Administration System Data

To provide our services, we require access to our customers’ Patient Administration Systems and other network systems. However, we do not collect or retain Personal Information from these systems (except for de-identified claims and billing data noted above).

3.4 Patient Information for Custom Solutions

Where we provide custom solutions that use identifiable patient data, the system operates on servers provided by our customers, following their remote access and network security policies. Responsibility for protecting this Personal Information remains with our customers.

4. How do we collect Personal Information?

We may collect Personal Information when you email us, interact with us by phone, or meet with us in person, whether at our business location or elsewhere.

We may also collect Personal Information when data is sent to our systems via APIs, either through integration components installed on our customers' networks or via components developed by our customers in accordance with our API documentation.

5. Non-consented Collection of Information

We endeavour to ensure that a representative from Interweave Integration Limited is aware when Personal Information is being collected. If we obtain Personal Information without a person's knowledge (such as by accidental acquisition from a client or third party), we will either delete/destroy the information or inform the individual that we hold the information, in accordance with the Information Privacy Principles.

6. How do we use an individual's Personal Information?

We use Personal Information for several purposes, including but not limited to:

- providing our services,
- improving service quality,
- internal administrative purposes, or
- other purposes as needed.

7. Disclosure of Personal Information to Third Parties

We may disclose Personal Information to third parties in accordance with this Privacy Statement, such as:

- professional service advisors (e.g., Accountants, Lawyers),
- service providers we may use from time to time,
- employees, contractors, and/or related entities,
- IT service providers, data storage, web hosting, and server providers,

- third-party contractors and technology providers assisting with our business processes.

8. Overseas Disclosure

While we aim to store Personal Information in New Zealand, where we disclose Personal Information to overseas third parties, these entities may store, transfer, or access the information outside New Zealand. We will only disclose your Personal Information overseas in compliance with the Privacy Act 2020.

9. How do we protect Personal and Sensitive Information?

9.1 Internal and External Electronic Protection Measures

Our Privacy Officer oversees this Privacy Statement and ensures compliance with the Privacy Act 2020. We commit to taking all reasonable steps to keep the Personal and Sensitive Information we hold confidential and secure. To achieve this, we:

- Maintain physical security at our business locations,
- Store data on virtual machines within our customers' networks or secure data centres in New Zealand,
- Use secure channels, such as HTTPS or WSS, for data transmission,
- Use secure protocols (e.g., RDP or SSH) for remote access,
- Implement multifactor authentication for access to our systems,
- Deploy security software, including anti-virus and firewalls,
- Limit data access to personnel who require it for service provision,
- Avoid disclosing Personal Information to entities in jurisdictions without comparable data protection standards.

10. Online Activity Tracking

10.1 Direct Marketing

With your consent, we may send you direct marketing communications about our services. These may be sent in various forms, such as mail, SMS, and email, in accordance with New Zealand's Unsolicited Electronic Messages Act 2007.

You may opt out of receiving marketing communications at any time by following the "unsubscribe" instructions or contacting us.

11. Data Breach Response Plan

In the event of a data breach or suspected breach, we will activate our Data Breach Response Plan to mitigate any potential loss or harm. This plan aligns with guidance from the New Zealand Office of the Privacy Commissioner.

Our Response Plan includes steps for identification, containment, assessment, and reporting, as well as a review and reflection process.

12. Security

We are committed to safeguarding the Personal Information we collect and maintain, applying appropriate physical, electronic, and managerial measures to prevent unauthorised access, disclosure, or misuse. However, we cannot guarantee the security of:

- Information transmitted over the Internet, or
- Information stored on customer servers to which we have access.

13. Retention of Personal and Sensitive Information

We retain Personal or Sensitive Information only as long as necessary to fulfil our services, unless otherwise required by law.

14. Access and Correction of Personal Information

Interweave Integration Limited endeavours to keep Personal Information accurate, complete, and up to date. If you wish to access or correct the Personal Information we hold, contact us directly, and we will respond within 1-2 business days.

15. Updates to this Privacy Statement

We may update this Privacy Statement. Changes will be posted on our website at www.interweave.nz Please review this Privacy Statement periodically.

16. Privacy Act, IPPs, and Inconsistency

Any areas not covered by this Privacy Statement are governed by the Privacy Act 2020 and the IPPs, which will prevail in case of inconsistency.

17. Inquiries and Complaints

For complaints about how Interweave Integration Limited handles Personal Information, please contact our Privacy Officer.

If unsatisfied with our response, you may contact the New Zealand Office of the Privacy Commissioner at <https://privacy.org.nz/>.

How to Contact Us

Privacy Officer

Interweave Integration Limited

Email: privacyofficer@interweave.co.nz

Phone: +64 21 322848