



Data and Privacy Policy	Manual	
	Issue Date	16 August 2025
	For Review	16 August 2027
	Approved	
	Signature	

1. STATEMENT OF INTENT

- 1.1 The Ngāti Hinemanu, Ngāi Te Upokoiri me Ōna Piringa Hapū Authority Trust (the Trust) is committed to protecting the personal information of its members in accordance with the New Zealand Privacy Act 2020 and relevant Māori principles of data sovereignty (Rangatiratanga).
- 1.2 This Policy outlines the principles and practices followed by the Trust in relation to the collection, storage, use, and disclosure of personal information.

2. PURPOSE

- 2.1 The purpose of this Policy is to ensure that all personal information collected by the Trust is managed in a manner that complies with:
 - The Privacy Act 2020;
 - The Māori Data Sovereignty principles (Te Mana Raraunga); and
 - Ngā Kaupapa tuku iho me ōna tikanga of the Trust.
- 2.2 This Policy aims to:
 - Protect the privacy rights of individuals;
 - Ensure transparency and accountability in the Trust's management of data; and
 - Promote the trust and confidence of its members in how their personal data is handled.

3. SCOPE

- 3.1 This Policy applies to all personal information collected, stored, used, or disclosed by the Trust during its activities. Personal information includes, but is not limited to, the following:
 - Member registration details;
 - Contact information (e.g., email addresses, phone numbers, and postal addresses);
 - Iwi and hapū affiliations;
 - Whakapapa (genealogical) information; and
 - Any other personal information relevant to the Trust's operations.
- 3.2 This Policy covers all trustees, employees, contractors, and volunteers who have access to or handle personal information on behalf of the Trust.

4. DATA SOVEREIGNTY

In recognition of the unique relationship that Māori have with data as a taonga, the Trust acknowledges its responsibilities under Te Tiriti o Waitangi to uphold the principles of Māori data sovereignty. This means:

- Ensuring that personal information collected from Māori is managed in accordance with tikanga Māori and the wishes of Ngāi Te Upokoiri, Ngāti Hinemanu, Ngāti Honomōkai and Ngāti Māhuika hapū (hereafter known as the hapū;
- Protecting whakapapa information with the highest level of care and respect;
- Consulting with hapū members on the use of personal data that has collective significance; and
- Ensuring that any third-party providers with access to Māori data respect the Trust's cultural obligations.

5. PRINCIPLES FOR DATA MANAGEMENT

The Trust follows the following privacy principles as outlined in the New Zealand Privacy Act 2020 (hereafter known as the Act):

5.1 Collection of Personal Information

5.1.1 The Trust will only collect personal information that is necessary for its legitimate purposes, including:

- Administration of membership;
- Communication with members;
- Delivery of services and programmes;
- Fulfilment of legal and contractual obligations, and
- Protection and promotion of hapū rights and interests.

5.1.2 Members will be informed of the purpose of collecting personal information and given the option to consent to its collection.

5.2 Use of Personal Information

Personal information will only be used for the purpose for which it was collected, unless:

- The individual has consented to the use of their information for another purpose;
- It is required or authorised by law; or
- It is necessary to prevent or mitigate harm to an individual.

5.3 Storage and Security of Personal Information

The Trust will take all reasonable steps to ensure that personal information is stored securely and protected from unauthorised access, modification, or disclosure. This includes:

- Secure lockable storage systems;
- Password-protected databases; and
- Limiting access to personal information to authorised personnel only.

5.4 Access and Correction

5.4.1 Members have the right to request access to the personal information held by the Trust and to request corrections to any inaccuracies. The Trust will respond to such requests within 20 working days in accordance with the Act.

5.4.2 Members can access or update their information by emailing registrar@piringahapu.com or by visiting the office.

5.4.3 Members have the right to cancel their membership and request the removal of their personal data from the Trust's database at any time. To initiate this process, members need to send an email to registrar@piringahapu.com. The Trust will handle such requests within 20 working days in accordance with the Act and ensure that personal data is securely removed. This

- 5.4.4 Information on the processes in 5.4.2 and 5.4.3 will be made available on the Trust's website to ensure all members are informed of the steps they need to take.
- 5.5 Disclosure of Personal Information

Personal information will only be disclosed to third parties with the individual's consent, or when required by law. The Trust may disclose information to:

 - 5.5.1 Service providers contracted to assist with Trust operations (e.g., accountants, auditors, IT service providers);
 - 5.5.2 Government agencies when legally obligated; and
 - 5.5.3 Other hapū and iwi entities where sharing information is necessary for cultural or operational purposes, subject to consent.

6 PROCESS FOR DATA COLLECTION AND MANAGEMENT

The following steps will be followed when collecting and managing personal information:

- 6.1 Collection
 - 6.1.1 Personal information will be collected directly from the individual wherever possible (e.g., through registration forms or direct communication). Where information is collected from the Trust or representative/s of the Trust, the Trust will ensure that consent has been obtained either verbally or in writing.
 - 6.1.2 If consent is provided verbally, the Trust or representative/s of the Trust collecting the information will clearly explain to the individual the purpose for collecting their personal information and how it will be used and will only collect the information if the individual understands and verbally agrees.
- 6.2 Use and Disclosure

The Trust will only use personal information for the purpose for which it was collected, unless specific additional consent is obtained.
- 6.3 Storage

All personal information will be securely stored, with appropriate digital protections and access controls in place.
- 6.4 Retention and Destruction

Personal information will be retained only as long as necessary for the purpose for which it was collected. Once no longer needed, personal information will be securely destroyed.

7 DATABASE

- 7.1 The Trust's database is maintained using MS Excel. The database is managed by the Trust's designated Data Administrator, who is responsible for regular updates, backups, and maintenance.
- 7.2 In the event of technological advancements or software updates, the Data Administrator will ensure that the system remains current and that all data is transferred securely and accurately to any new platform.
- 7.3 The Trust will maintain a secure and up-to-date database system to manage hapū registrations. This system will be designed to facilitate the efficient storage, retrieval, and updating of member information.
- 7.4 Access to the database will be restricted to specific personnel who are responsible for data entry and management. These individuals will be required to sign Non-Disclosure Agreements (NDAs) and will be prohibited from sharing personal data or using it for purposes other than those specified in this Policy.
- 7.5 The database system will be reviewed yearly and updated to incorporate the latest technology and best practices in data management.

- 7.6 The Trust will implement backup procedures to ensure that member data is not lost in the event of a system failure. These backups will be securely stored in compliance with data protection standards.
- 7.7 The database will include features that allow for the easy identification of different member categories, such as whakapapa members, honorary members, and non-active members, to ensure accurate record-keeping and reporting.
- 7.8 Data Aggregation and Anonymised Reporting
- 7.8.1 The Trust may aggregate personal data collected from members to produce anonymised reports and statistical summaries. These aggregated data sets may include information such as age distribution, employment status, and other demographic indicators.
- 7.8.2 The process of data aggregation ensures that individual members' identities remain confidential. No personally identifiable information (PII) will be shared or disclosed in these reports. The aggregated data will be used solely for the purpose of gaining insights into the community's demographics, which will help the Trust in decision-making and resource allocation.
- 7.8.3 These anonymised reports may be shared with the community, marae, or other relevant stakeholders to provide a better understanding of the hapū demographic profile, but at no point will the specific data of individual members be disclosed.

8 DISPUTE RESOLUTION

- 8.1 In the event of any concerns or disputes regarding the management of personal information, members may lodge a formal complaint with the Trust in writing. The Trust will:
- Acknowledge the receipt of the complaint within 5 working days;
 - Investigate the complaint thoroughly; and
 - Provide a written response within 20 working days outlining the outcome and any steps taken to resolve the issue.
- 8.2 If the complainant is not satisfied with the Trust's response, they may escalate the complaint to the Office of the Privacy Commissioner for independent resolution.

9 BREACHES OF PRIVACY

- 9.1 In the event of a privacy breach (e.g., unauthorised access to personal information), the Trust will:
- Take immediate steps to contain the breach and prevent further unauthorised access;
 - Notify the individuals affected and inform them of the nature of the breach and the steps being taken;
 - Report the breach to the Office of the Privacy Commissioner if there is a risk of serious harm, and
 - Investigate the cause of the breach and implement measures to prevent future occurrences.
- 9.2 If personnel are found to be in violation of data sharing policies, disciplinary actions will be enforced. These may include, but are not limited to, termination of employment.

10 REVIEW

- 10.1 This Policy will be reviewed every three years to ensure it remains relevant and effective. Any amendments to this Policy must be approved by the Trust Board.

10.2 The Trust will also consider changes in legislation, technology, and best practices in data and privacy management when reviewing and updating this Policy.

11 DOCUMENTS RELEVANT TO THIS POLICY

The following documents are relevant to this Policy and should be referenced as needed:

- Ngāi Te Upokoiri me ona Piringa Hapū Authority Deed of Trust 2023;
- Te Piringa Hapū and Marae Registrations Form;
- Te Piringa Hapū Ahikaa Registrations Form;
- Te Piringa Hapū Registrations Policy;
- Te Kawa o Te Komiti Whakahonohono/Validations Committee Terms of Reference; and
- Non-Disclosure Agreement (NDA) Form.