

1. How does this policy apply to you?

This Privacy Policy (**Policy**) explains how the Wish for a Smile Trust (**Trust, us or we**) collects, uses and shares information about Applicants and Guardians.

In this Policy, the following terms have the following meanings:

Applicant means a child aged between 11 and 16 that submits an Application, or that has an Application submitted on their behalf by a Guardian;

Application means an application to the Trust, completed either in hard copy or through an online portal, to receive orthodontic treatment through the Trust;

Guardian means the parent(s), caregiver(s), legal guardian(s), or other members of an Applicant's household(s) on behalf of whom information is provided as part of an Application; and

you or your refers to the Applicant, or the Guardian that is completing the Application on behalf of the Applicant, or both (as context requires); and

our websites means <https://wishforasmile.org.nz/> and wfas.co.nz.

2. Why do we collect your information?

We will only collect information from you (or from the third parties set out in this Policy) that we consider to be reasonably necessary for the Trust to operate and achieve its objective of providing access to orthodontic treatment to underserved communities. This may include collecting information for one or more of the following purposes:

- to identify you and your contact details so that we can get in touch with you regarding your Application or your orthodontic treatment;
- to assess the eligibility of an Application, which includes collecting:
 - information to assess the extent of any dental issues that could be addressed with orthodontic treatment;
 - information to assess your financial situation to allow us to:
 - confirm that the circumstances of the Applicant are such that they would not otherwise have the means available or the opportunity to receive orthodontic treatment; and
 - confirm that someone in the Applicant's household or community is able to make the minimum donation payments required by the Trust;
 - written references from adults that know the Applicant at school and/or in the community, to establish the Applicant's good character and describe any contributions that they make to their school and/or community; and
 - short written letters from you explaining the reasons why you are submitting an Application, which allows us to better understand the impact that orthodontic work could make for the Applicant when deciding which Applications should be successful;

- for auditing, research and/or publication purposes, provided always that any information that we use for these purposes will be anonymised and aggregated prior to use. This means that we will only use your information for these purposes in a way that ensures that you cannot be identified;
- to provide updates to the Trust's donors and sponsors of the identities and experiences of the recipients of orthodontic treatment through the Trust, provided that we will only share your information with donors and sponsors for this purpose if you have given your express consent to such disclosure in your Application;
- for use in marketing, promotional materials, or testimonials relating to the Trust or our affiliated orthodontic providers, provided that we will only share use your information for this purpose if you have given your express consent to such disclosure in your Application;
- to respond to and resolve requests, questions, comments and complaints;
- where we need to do so under law, including to let you know if your information is used in a way that's not set out in this Policy; and
- to investigate and protect against fraud, theft and other illegal activities.

3. What information do we collect and hold?

The Application process is split into two rounds, and the extent of the information that we collect from you will depend on whether or not your Application is selected to progress to the second round of consideration where additional information will be requested.

The first round requires you to submit an online or paper-based application form and some supporting documentation. The Application form will ask you to provide your personal details including details about the financial situation of the people that live in the Applicant's household or that financially support the Applicant, and will also require you to provide a Dental Assessment form completed by the Applicant's dentist, dental therapist, or dental hygienist (alternatively, the Applicant's dentist, dental therapist, or dental hygienist can provide this form directly to us).

If your Application is selected to progress to the second round of consideration, you will need to attend a consultation with one of our affiliated orthodontists, who will conduct an orthodontic assessment and provide the results of that assessment to us directly through an online portal.

The information that we collect from you may include:

- Name, date of birth, gender, immigration status, and ethnicity (optional) of the Applicant and the Applicant's parent(s) or caregiver;
- contact information such as names, postal addresses, email addresses and phone numbers of the Applicant and Guardians;
- all information required in order for us to progress and assess the Application, including sensitive financial information and details relating to the Applicant and Guardians;
- information about the Applicant's oral health and any dental issues affecting your child, including:

- an assessment form completed by the Applicant's dentist, dental therapist, or dental hygienist identifying any relevant occlusal traits or other oral health issues (which we receive as part of the first round of the Application process);
- photographs of the Applicant's face and mouth; and
- if your Application is selected to proceed to the second round of the Application process, details of an orthodontic assessment of the Applicant completed by one of our affiliated orthodontists, including scans, x-rays, and further photos of the Applicant's face and mouth;
- if your Application is successful and you receive orthodontic treatment through the Trust, evidence of the completion of 20 hours of volunteer work (in the form of a log book which will be provided by your assigned orthodontist and must be signed off by your volunteer supervisor at the end of the first year or treatment); and
- any other information provided to us by you in connection with or in support of your Application or the relevant orthodontic treatment.

If we are not able to collect this information, then that may impact on our ability to process your Application and, ultimately, whether we are able to provide orthodontic treatment.

4. Who do we collect your information from?

We will, where reasonable and practicable to do so, collect personal and health information directly from you. We may also collect personal information and health information from third parties such as:

- the Applicant's dentist, dental therapist, or dental hygienist, in the event that you agree to have the dentist, dental therapist, or dental hygienist directly submit the Applicant's Dental Assessment form to us as a part of your Application in the first round; and
- if your Application is selected to proceed to the second round of the Application process, the assigned orthodontist that we refer the Applicant to for their orthodontic assessment, in which case the information will be provided directly to us by the relevant orthodontist through a secure online portal.

5. Who do we share your information with?

We may share information with our affiliated orthodontists, suppliers, consultants, contractors, or agents to the extent required to enable us to achieve the objectives and perform the functions of the Trust, including, in the event that your Application is successful, to refer the Applicant to the orthodontist that will perform the treatment for the Applicant;

We may also use your information to combine with information received from other applicants to create anonymised and aggregated data that we share with our research partners for auditing, research and/or publication purposes. This anonymised and aggregated data will not identify you in any way.



6. Your rights

You may request confirmation of any information we hold about you, as well as access to or correction of the information we hold about you at any time by contacting us at the details set out below. If we are not able to help you with your request, we will tell you why in writing and how to complain.

7. How to contact us

If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact our Privacy Officer on the following details:

Post:

Attn: Privacy Officer
Wish For a Smile Trust
20 Tennyson Street, Te Aro
Wellington, 6011
NEW ZEALAND

E-mail: wfastrust@gmail.com

If you are not satisfied with our response, you may complain to the New Zealand Privacy Commissioner via the website: <https://www.privacy.org.nz/your-rights/making-a-complaint/>

8. Links to other Websites

Our websites may contain links to other websites that are not under our control.

We have no responsibility for linked websites, and provide them solely for your information and convenience. Your disclosure of personal information to third-party websites is at your own risk.

9. Changes to our Privacy Policy

We may revise this Policy from time to time as we add new features or as laws change that may affect our operation or our websites. When we make changes to our Privacy Policy, they are reflected on this page.

This policy was last updated in October 2022.

