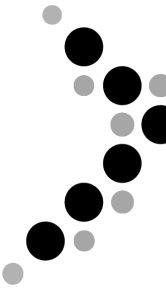


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**internetnz**



## **Review of the Telecommunication Information Privacy Code**

Tēnā koe,

Thank you for consulting with InternetNZ on the opportunity to review the Telecommunications Information Privacy Code (TIPC).

The call for submissions identifies two possible approaches to the review: a minimalist amendment consequent to the Privacy Act 2020, or a wider review of the currency and efficacy of the Code.

InternetNZ would welcome a wider review of the TIPC to ensure it is fit for purpose in a modern telecommunications landscape. As a fast-moving industry, telecommunications will continue to be impacted by emerging technologies, surfacing new privacy issues which the current Code may not effectively address. We think a minimalist review would miss an opportunity to future-proof the TIPC, ensure it is in line with international best practice, and make the Code more visible and usable for members of the public who may not be aware of the obligations on telecommunications providers.

As InternetNZ said in our submission on the Privacy Bill, it is critically important to ensure New Zealand's privacy frameworks are and remain up-to-date. We think a better Internet requires robust and usable privacy protections, which recognise both that privacy is a human right, and that people's privacy interests are deeply connected with changing technologies. We also recommended that New Zealand's approach to privacy include consideration of the European Union's General Data Protection Regulation (GDPR), which sets out important requirements to trade with the EU, and offers an emerging standard for protecting personal information globally.

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harness the power  
of the Internet.**

We welcome this review as a chance to address these broader interests, and to consider more specific recent amendments, for example the “Emergency caller location information” which changes the role of telecommunications providers in supporting emergency services.

If the review goes ahead, InternetNZ will participate in any consultation processes and provide substantial feedback during the review. If you would like to discuss this further please contact me at [kim@internetnz.net.nz](mailto:kim@internetnz.net.nz).

Ngā mihi,



Kim Connolly-Stone  
**Policy Director**