

# Invercargill Airport Limited CORPORATE PROCEDURES

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Supersedes:

Approved by: General Manger

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Review: 3 yrs or as required

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## Privacy Policy

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### 1. Introduction

Invercargill Airport Limited (referred to in this Privacy Policy as “we”, “our” or us) complies with the New Zealand Privacy Act 2020 (the **Act**) when dealing with personal information. Personal information is information about you (where you are a natural person) that identifies you, or by which your identity can be reasonably be ascertained.

This policy sets out how we will collect, use, disclose and protect your personal information.

This policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see [www.privacy.org.nz](http://www.privacy.org.nz)

### 2. Changes to this policy

We may change or update this policy from time to time and we will tell you about a change by updating the “last updated” date on our website. We advise you to check back frequently to see any updates or changes. Unless otherwise stated, any changes to the Privacy Policy will take effect immediately upon being placed on the website and your continued use of any services offered by us will represent an agreement by you to be bound the Privacy Policy as amended.

**This policy was last updated on 11 December 2020.**

### 3. Application of this Privacy Policy

This Privacy Policy applies to any personal information that we collect when you interact with us, including when you:

- Visit us;
  - Use our online services;
  - Use our website; and/or
  - Use any other services we provide now and in the future.
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## **4. How we collect your personal information**

We (and any authorised third parties in accordance with this Privacy Policy) may collect personal information about you from:

- you, when you provide that personal information to us, including via the website and any related service, through any registration or subscription process, through any contact with us (e.g. telephone call or email), or when you buy or use our services and products; and,
- third parties:
  - as part of our recruitment processes;
  - when you submit an application for employment or contracting opportunities with us;
  - through the recording of your images on CCTV footage in and around our properties;
  - when you log into our Wi-Fi;
  - through the use of cookies and usage monitoring software or Google Analytics when you use our website;
  - where you have authorised this or the information is publicly available.

If possible, we will collect personal information from you directly.

Further information about our use of CCTV is available here [CCTV Policy](#)

## **5. What personal information we collect**

The personal information we collect about you may include:

- Your name and contact details, address;
- Credit references;
- Details of communications we have had with you including email communications and phone conversations with our staff;
- Image (via photograph or film) as you move around our properties;
- Flight and booking details;
- Number of visits to airport;
- Date when you use our website such as your IP address.

## **6. What happens if you do not provide personal information requested.**

If you do not provide the personal information requested you may be unable to use some of our services or access certain areas or our properties.

## **7. How we use your personal information.**

We may collect, store and use your personal information:

- *to verify your identity*
- *to carry out activities required by law or regulatory requirements*
- *to carry out administration or business functions such as processing your transactions*
- *to provide services and products to you*
- *to market our services and products to you, including contacting you electronically (e.g. by text or email for this purpose)*
- *to improve the services and products that we provide to you*
- *to undertake credit checks of you (if necessary)*
- *to bill you and to collect money that you owe us, including authorising and processing credit card transactions.*
- *to respond to communications from you, including a complaint*
- *to conduct research and statistical analysis (on an anonymised basis)*
- *to protect and/or enforce our legal rights and interests, including defending any claim*
- *for safety and security purposes*
- *consider employing you, for example, carrying out pre-employment checks and to meet our requirements as your employer (where applicable)*
- *such other purpose we make known to you at the time of collection of the personal information*
- *for any other purpose authorised by you or the Act.*

We will only use the personal information we collect for the purpose or purposes for which it was collected or for other purposes you consent to. We may also use the information in a form where the individual is not identifiable and for statistical purposes. We may publish statistical analysis using personal information provided individuals are not identifiable.

## **8. Disclosing your personal information**

We may disclose your personal information to:

- *our shareholder(s)*
- *any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products.*
- *a credit reference agency for the purpose of credit checking you*
- *other third parties (for anonymised statistical information)*
- *a person who can require us to supply your personal information (e.g. a regulatory authority)*

- *any other person authorised by the Act or another law (e.g. a law enforcement agency)*
- *any other person authorised by you.*

By using our services, or providing us with your personal information, you consent to the disclosure of your personal information to the parties listed above. We will not disclose your personal information to any other third party other than as outlined above.

*A business that supports our services and products may be located outside New Zealand. This may mean your personal information is held and processed outside New Zealand. Where personal information is held overseas we will ensure that business is subject to comparable safeguards to those in the Act. However as detailed within Google's privacy policy you should be aware that they may share information they have collected publicly and with their partners.*

## **9. Protecting your personal information**

We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse. This includes taking reasonable steps to ensure our electronic systems, passwords and filing cabinets containing personal information are secured. However, communications over the internet such as emails, are not secure unless they have been encrypted. It is your responsibility to protect access to any emails you receive from us.

Where we collect personal information from you we will only hold and store that personal information for the duration it is required. Once we no longer require it we will securely delete the information within a reasonable timeframe.

## **10. Accessing and correcting your personal information**

We will take reasonable steps to ensure personal information we hold is up to date and accurate. However, we will rely on the information that you provide us so please ensure that information is accurate and kept up to date.

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested the correction.

If you want to exercise either of the above rights, email our Privacy Officer at [admin@invercargillairport.co.nz](mailto:admin@invercargillairport.co.nz). Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).

We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.

## **11. Internet use**

While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.

*[If you post your personal information on the website's [message board/ chat room], you acknowledge and agree that the information you post is publicly available.]*

If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

## **12. Cookies and Google Analytics**

We may use cookies (an alphanumeric identifier that we transfer to your computer's hard drive so that we can recognise your browser) to monitor your use of the website. You may disable cookies by changing the settings on your browser, although this may mean that you cannot use all of the features of our website.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage. By using our website you consent to the processing of data about you by Google in the manner described in "How Google uses data when you use our partners site or apps" which you can read at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners)

## **13. How to contact us and make a complaint.**

If you have any questions about this privacy policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, or to make a complaint, you can contact our Privacy Officer at [admin@invercargillairport.co.nz](mailto:admin@invercargillairport.co.nz) using the heading of your email "For the attention of the Privacy Officer"

You also have the right to make a complaint to the New Zealand Office of the Privacy Commissioner. You can find information about how to make a complaint on our website.

**Authorised by:** \_\_\_\_\_ **General Manager**

**Date of approval:** \_\_\_\_\_

**Authorised by:** \_\_\_\_\_ **Board Chairman**

**Date of approval:** \_\_\_\_\_