

# Rotorua Airport – Privacy Policy

## Policy #38

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**Person Responsible: CE**

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### 1. Purpose

- 1.1 Rotorua Regional Airport Limited ("RRA", "we", "us") is committed to respecting your privacy at all times.
- 1.2 This Privacy Policy covers all our products and services, including the ones you can use without paying, and all our interactions with you. It sets out how we collect, use, share and protect your personal information to comply with the Privacy Act 2020 and the European Union General Data Protection Regulation (if applicable). RRA is the data controller of the personal data and agency.
- 1.3 By providing your personal data or using our services, including in relation to The Business Hub, you agree to this Privacy Policy and consent to us processing of your information. If you provide data about any other person, then you must have authorisation from that person to provide such data to us.
- 1.4 We may need to modify or amend this Privacy Policy from time to time. When we do, we will post an updated version on our website. By attending RRA, continuing to use The Business Hub, app, website, or any of our products and services you consent the terms of this Privacy Policy and to any such modifications or amendments.
- 1.5 This Privacy Policy is subject to and should be read in conjunction with (where applicable) our Acceptable Use Policy, The Business Hub Terms and Conditions, and any other service-specific terms and conditions.

### 2. Summary

#### *We collect some personal information*

- 2.1 Personal information includes any information that could identify you, for example:
  - 2.1.1 your name, personal details, flight details, contact details.
  - 2.1.2 data we collect when you use our website, social media, and apps.
  - 2.1.3 your verbal or written interactions with us.
  - 2.1.4 video and audio recordings of you when you are at RRA.
  - 2.1.5 Bank account and IRD numbers (for RRA staff only)

#### *We use it to:*

- 2.2 provide you with products and services.
- 2.3 improve our products and services.
- 2.4 keep you and others safe and secure.
- 2.5 comply with laws and with other responsibilities.

*We only use information if we are allowed to - or if the law requires it*

2.6 Whenever we work with personal information, we comply with New Zealand laws, including the Privacy Act, and laws of other countries that apply to us. We are allowed to use personal information when:

- 2.6.1 you agree to let us use it.
- 2.6.2 we fulfil a contract, and to give you the products or services you have asked for.
- 2.6.3 we run and develop our business.
- 2.6.4 we meet our legal obligations.

*You have rights to access your personal information*

2.7 We know that your personal information and your privacy are important. This Policy contains more information on your rights below, including how to make a request to access or correct your personal information below. Otherwise, please get in touch if you have any questions or complaints.

*What information do we collect?*

*Personal information and data collected from your general interactions with us*

- 2.8 The personal information we may collect includes your:
- 2.8.1 name, contact details, date of birth, flight and booking details, passport details, driver licence number, credit card details plus for RRA staff only bank account and IRD numbers;
  - 2.8.2 location and movements in public areas of RRA and its close surroundings, (via CCTV footage);
  - 2.8.3 image (via photograph or video) within RRA;
  - 2.8.4 vehicle details including licence plate number;
  - 2.8.5 audio of your conversations with our staff, agents or any other persons that take place within our buildings or grounds ;
  - 2.8.6 email communications, and your written interactions with us or our agents;
  - 2.8.7 number of visits to RRA;
  - 2.8.8 travel destination or preferred destinations;
  - 2.8.9 use of our social media platforms; and
  - 2.8.10 preferences concerning types of products or services.

*Personal information and data collected when you use our websites and apps*

2.9 When you visit or use our websites or apps, we collect data (using “cookies” web beacons and usage monitoring software) (including the IP address and phone number of your machine or device, the operating system and the browser your machine or device uses, your browser's general Wi-Fi location, the date and time you are visiting and the pages you view and your preferred travel destinations).

2.10 Data regarding your usage of our websites and our apps is collected to help us improve and offer the services you need each time you visit and to improve our services generally. We may also use this data to improve our advertising and marketing of related products and services.

2.11 You have the opportunity, using your browser settings, to set your devices to accept all cookies, to notify you when a cookie is issued, deleted, or not to receive cookies at any time.

*To learn more about cookies, visit [allaboutcookies.org](https://www.allaboutcookies.org).*

- 2.12 Sometimes our apps and websites have links to third-party apps and websites. We take care when we choose websites we link to, but we are not responsible for their content, accuracy, or privacy practices.

*How do we collect your information?*

- 2.13 Personal information and data will be collected directly from you when you interact with us over the phone, through email or letter, via our websites or apps, when you come to RRA, meet with one of our staff or agents or where you use our services.
- 2.14 We (and any authorised third parties in accordance with this Privacy Policy) may also collect personal information and data:
- 2.14.1 by recording audio in specific locations in and around RRA;
  - 2.14.2 through recording CCTV footage in and around RRA;
  - 2.14.3 by filming, or taking photographs, of you on or around RRA property (which may be used in our marketing materials);
  - 2.14.4 when you access any of our retail systems;
  - 2.14.5 when you log into our Wi-Fi; and
  - 2.14.6 through the use of cookies, web beacons and usage monitoring software when you use our websites and apps.
- 2.15 There may also be occasions when we collect/receive your personal information and data from a third party, such as:
- 2.15.1 where you have authorised this;
  - 2.15.2 a publicly available source;
  - 2.15.3 a government department, body, or law enforcement agency (in relation to security matters);
  - 2.15.4 an airline or retail outlet;
  - 2.15.5 a service provider; and
  - 2.15.6 third party providers of cookies and other online tracking systems.

*How we use your information*

- 2.16 We must have a reason to use your personal information and data, such as:
- 2.16.1 to allow us to comply with our legal obligations;
  - 2.16.2 to allow us to assist or provide you with a product / service / issue;
  - 2.16.3 where we have your consent to do so;
  - 2.16.4 to run day to day operations, and develop our business; or
  - 2.16.5 in the case of special categories of personal data, that it is in the substantial public interest.
- 2.17 In summary, we use your personal information when:
- 2.17.1 we need to comply with laws and regulations;
  - 2.17.2 you use any of our products or services;
  - 2.17.3 we market our products and services to you;
  - 2.17.4 we manage our business.

*To comply with laws and regulations*

- 2.18 Your safety and security are very important to us. We use your personal information to keep you and others safe and to monitor potential risks at the RRA.

2.19 We may need to use your personal information:

- 2.19.1 for safety and security purposes;
- 2.19.2 for risk management;
- 2.19.3 as part of the investigation and analysis of incidents;
- 2.19.4 to comply with aviation and security laws and regulations.

*When you use our products or services*

2.20 When you use our products or services, we may use your personal information and data for the following reasons:

- 2.20.1 to process your transactions and administer your account;
- 2.20.2 to help us administer and facilitate our services and operations and those of our business partners.

*When we market our products and services to you*

2.21 We use your personal information to decide what marketing information to send you. We also use it while working with our advertising partners to decide where to place adverts on websites and social media.

2.22 Marketing messages we send you may include news about products or services we believe will be relevant to you.

2.23 If you ask us not to send you any email marketing materials or research surveys, we will make that change as soon as we can. The messages you receive from us will have instructions for how you can remove yourself from our mailing list.

2.24 If you do opt out, we may still have to send you operational communications. These may include messages that:

- 2.24.1 are about flights; or
- 2.24.2 are about safety or security at RRA.

*When we manage our business*

2.25 We use your personal information to run our business and to help it operate more efficiently. We may use your personal information and data for the following reasons:

- 2.25.1 for internal purposes (risk management, staff training and billing);
- 2.25.2 to contract with authorised individuals/entities;
- 2.25.3 to improve, manage and develop our services;
- 2.25.4 planning, building and monitoring our systems;
- 2.25.5 to conduct market research and to promote and market our, or our commercial partners', products and services;
- 2.25.6 fixing any issues in our processes and services, including contacting you to do so.

2.26 Some uses of your personal information and data may involve the transfer of that data outside New Zealand, to be held and used by our related companies and commercial partners.

*Who will we share your information with?*

2.27 Personal information and data held by us will be accessible by our staff or advisors where it is necessary for that staff member or advisor to carry out their duties.

- 2.28 We will not disclose your personal information and data to other people or agencies except where:
- 2.28.1 you have authorised such disclosure;
  - 2.28.2 disclosure is required by or to our contractors or business partners (for the purposes of the products / services they provide), so that we can assist you with a transaction on your behalf or provide you with a product / service that you have requested;
  - 2.28.3 disclosure is to a law enforcement agency that is entitled to such information under its statutory powers;
  - 2.28.4 we are required to provide the information by law;
  - 2.28.5 disclosure is required for safety and security and data assurance purposes;
  - 2.28.6 disclosure was the purpose of collecting the data;
  - 2.28.7 disclosure is required to facilitate the sale, disposal, assignment or transfer of our business or any of its assets or subsidiaries or related companies;
  - 2.28.8 disclosure is necessary following a transfer of our rights and duties;
  - 2.28.9 disclosure is necessary to market, review or improve our services or facilities or those of our business partners;
  - 2.28.10 disclosure is necessary for third parties to offer you products and services that may be of interest to you and to optimise the advertisements on our websites; or
  - 2.28.11 it is necessary for a function of our business, such as for legal or auditing purposes.
- 2.29 If your personal information and data is transferred to a third party in a non-approved country, we will ensure that suitable safeguards are put in place to ensure your personal information and rights are protected.
- 2.30 We may share your personal information and data with the following organisations in a manner consistent with the use and disclosure purposes listed above:
- 2.30.1 our contractors (for the purposes of the services they provide);
  - 2.30.2 law enforcement agencies;
  - 2.30.3 our authorised business partners and related third parties;
  - 2.30.4 those entities involved in providing, managing or administering your product or service;
  - 2.30.5 organisations we sponsor and loyalty program partners, including organisations that we have an arrangement with to jointly offer products;
  - 2.30.6 service providers that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
  - 2.30.7 payment system organisations;
  - 2.30.8 organisations that assist with our product planning, analytics, research and development;
  - 2.30.9 organisations involved in a transfer of our assets or business;
  - 2.30.10 mailing houses and media organisations who assist us to communicate with you, including media or social networking sites; or
  - 2.30.11 other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors, lawyers or other external advisors.
- 2.31 Where we receive requests for information from law enforcement or regulators, we validate these requests before any personal information is disclosed.
- 2.32 You have a right to contact us for more information about the safeguards we have in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

2.33 Reputable third parties may be provided with certain statistics (with personal identifiers removed) about our customers, readers, sales, traffic patterns (both online and within our property) and related site functions. We may use service providers to assist us to aggregate and anonymise such personal information and data, so that it does not include any identifying data. This aggregated and anonymised data is not personal information data and its use is not subject to this Privacy Policy.

#### *How do we protect your information and how long will we keep it for?*

2.34 We are committed to protecting the security of your personal information and we take all reasonable precautions to protect it from privacy breaches, namely:

- 2.34.1 unauthorised or accidental access, disclosure, alteration, loss, destruction of your personal information; and
- 2.34.2 actions which prevent us from accessing your personal information on a temporary or permanent basis.

2.35 If your personal information is subject to a privacy breach which causes or is likely to cause serious harm, we will notify you and the Privacy Commissioner in accordance with our obligations under the Privacy Act.

2.36 We implement and maintain security measures that are designed to provide reasonable protection against the loss, interference or misuse of your personal data and to prevent unauthorised access, modification or disclosure of your personal data. While we take all reasonable steps to protect your information transmitted over the internet, we cannot guarantee complete security. Your use of our services is subject to you also taking reasonable steps to protect yourself and your personal information.

2.37 Communications over the internet, such as emails, are not secure, unless they have been encrypted. We may and we may allow third parties to monitor our network for security and data assurance purposes.

2.38 We operate in New Zealand. Your personal information may be transferred and stored using cloud technology and stored in countries outside the European Union, including Australia and the United States of America, that are subject to different standards of personal information and data protection.

2.39 We are only permitted to store your personal information for as long as necessary having regard to the purposes for which it was collected or a related or ancillary purpose. We may destroy your personal information we hold after a reasonable period of time and, if you have not used our services for some time, you may have to re-enter, or re-supply, your personal information to us. At times, we may need to retain your personal information for a longer period. If we do not need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

#### *What if you do not provide us with your information?*

2.40 You can choose not to give us certain personal information and data. However, if you do not provide this to us, we may not be able to:

- 2.40.1 provide you with the product or service you want;
- 2.40.2 allow you access to RRA property;
- 2.40.3 respond to your requests;
- 2.40.4 manage or administer your product or service;
- 2.40.5 personalise your experience with us; or
- 2.40.6 verify your identity or protect against fraud.

## *Your rights and contacting us*

2.41 You have certain rights regarding your personal data including to:

- 2.41.1 request a copy of the personal information and data we hold about you;
- 2.41.2 request that we supply you (or a nominated third party) with an electronic copy of the personal information and data that you have provided us with;
- 2.41.3 inform us of a correction to your personal information and data;
- 2.41.4 restrict our use of your personal information data;
- 2.41.5 require us to erase your personal information data;
- 2.41.6 withdraw consent at any time for the processing of your personal information and data;
- 2.41.7 object to particular ways in which we are using your personal information data;  
or
- 2.41.8 lodge a complaint with a supervisory authority.

2.42 Your ability to exercise these rights will depend on a number of factors and, in some instances, we will not be able to comply with your request, for example, because we have legitimate grounds for not doing so or where the right does not apply to the particular personal information and data we hold about you. If you would like more information on these rights, wish to exercise them or have questions about your information, please contact the Data Privacy Officer in the first instance by emailing the Data Privacy Officer at [privacyofficer@rotoruaairport.co.nz](mailto:privacyofficer@rotoruaairport.co.nz), marking the subject heading of your email "For the attention of the Data Privacy Officer".

2.43 If you would like to make a complaint or learn more about your rights in relation to your personal information, please contact the New Zealand Privacy Commissioner ([www.privacy.org.nz](http://www.privacy.org.nz)) or any other supervisory authority.

## *Recording access request*

2.44 If you need to access recordings from our CCTV cameras, you will need to follow the 'release of recordings' process. Our operations team manages the release of recordings and will help you with the process. Note that recordings are only stored for 14 days.

2.45 The request must include the following details:

- 2.45.1 exact location, time and date the recording took place;
- 2.45.2 description of the incident/event including persons or vehicles involved etc;
- 2.45.3 reason for requesting the release of recordings.

2.46 We may not be able to comply with your request if it will also involve the release of personal information about other persons and their consent to its release cannot be obtained.

2.47 If your request is approved, you must complete and sign a "CCTV Footage release form" when you pick up a copy of the footage from the Airport Emergency Operations Team. These forms are only available in hard copy.

Contact us on (07) 345-8800

**Policy End**