



North Queensland Airports Group
Data Privacy Policy



Reference No: 7006 FIN

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Any alterations to this Policy must be approved by the Boards

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1. EXECUTIVE SUMMARY

North Queensland Airports Group (“**We, Our, Us**”) owns and operates Cairns Airport and Mackay Airport and owns the Mackay IBIS Hotel. We are committed to managing the privacy and confidentiality of your personal information in accordance with the **Australian Privacy Principles (APPs)** set out in the **Privacy Act 1988** (Cth).

We believe that the responsible use of personal information collected by us is critical to our business objectives and reputation.

We are subject to the *Privacy Act 1988* and adhere to the APPs when collecting, using, disclosing, securing and providing access to personal information.

As part of our commitment to privacy, we have adopted this Privacy Policy, which sets out how we deal with the management of personal information.

The contents of this Privacy Policy are subject to change from time to time.

2. COLLECTION OF PERSONAL INFORMATION

We may collect **personal information** so that we are able to provide our services and perform our business functions and activities.

The extent and type of personal information we receive from you depends on the information you provide to us through our contact mailboxes, through any registration process, through our website and/or when you request services or make enquiries.

In order for us to provide you with products or services or to otherwise assist you, we generally require your name, address and contact details. The type and amount of information necessary will vary depending on the products or services you require.

Where it is lawful and reasonable to do so, you can remain anonymous or use a pseudonym if you wish, however it may reduce the type and quality of products or services we will be able to provide.

2.1 WHAT IS "PERSONAL INFORMATION"

Personal information is any information, including any opinion, about an identified individual, or an individual who is reasonably identifiable:

- (i) whether the information or opinion is true or not; and
- (ii) whether the information or opinion is recorded in material form or not.

2.2 SENSITIVE INFORMATION

Personal information that we collect and use may also be **sensitive information** and we are required to ensure that sensitive information is only collected with your consent and that reasonable steps are taken to ensure the appropriate use, disclosure and protection of your sensitive information.

Sensitive information is personal information, which is given a greater level of protection under the Australian Privacy Principles, such as information about your health, criminal records, your religious beliefs or affiliations or political opinions.

We only collect such information where we are permitted to do so under the APPs and if such information is necessary to provide our services to you or where we are required to collect this information by law.

2.3 GOVERNMENT IDENTIFIERS

We may also collect and use your tax file number (as the context requires). We will only use this information where we are required to do so by law or in order to properly identify you or your property.

3. WHAT PERSONAL INFORMATION WE COLLECT AND WHY

The types of personal information which we collect will depend on the circumstances of its collection and the nature of your particular dealing with us. In general we collect personal information for the purposes of:

- (a) research, marketing and development;
- (b) identifying your needs and preferences so we can provide you with the appropriate service or product;
- (c) market intelligence;
- (d) statistical, data and trend analysis;
- (e) managing our security, safety and our operations;
- (f) dealing with queries (eg lost property, flight information);
- (g) dealing with complaints;
- (h) maintaining records;

- (i) dealing with incidents;
- (j) competitions;
- (k) required disclosures to third parties (eg court, police, insurer, a ride share/driver partner company);
- (l) business arrangements;
- (m) where we are required to do so by law or under a court order;
- (n) managing the risks associated with biosecurity risks or a pandemic risks on and around Airport; and
- (o) accounts payments.

We are also required to collect personal information by law to ensure compliance with our legal obligations or as required by various government agencies such as **Australian Federal Police, Civil Aviation Safety Authority, Australian Customs**.

In some circumstances, personal information is provided to us by **third parties or other organisations** conducting activities on your behalf. Such third parties would include for example your travel agent and it is assumed that you have provided consent for your personal information to be used and disclosed to us this way.

4. HOW WE COLLECT INFORMATION

4.1 *DIRECTLY FROM YOU*

Personal information will normally only be collected directly from you when you deal with us by telephone, by correspondence through a letter, fax or e-mail, via our Internet website, our Company apps or social media applications, CCTV footage, or by making an application for an ASIC, ADA or other form of identification card, or through direct face-to-face contact.

4.2 *ONLINE DEALINGS WITH US*

Other ways in which we may collect personal information includes through online dealings and transactions:

(a) **Online Payment Systems**

NQA uses third party process providers in the conduct of business transactions with its secure data centre protected by constantly updated firewalls and base level encryption and HTTPS protocols for login.

(b) Cookies

- (i) "Cookies" (small text files placed on your computer when you first visit our website) are used on some parts of our website. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's technology help desk or your internet service provider.
- (ii) Cookies are primarily used to enhance your online experience and are not used to track the navigational habits of identified visitors, unless we obtain your permission to do so. If you visit our website to read or download information, such as news stories or articles, much of the information we do collect is statistical only (for example the domain from which you access the internet, the date and time you access our site, and the internet address of the website from which you linked directly to our site) and is not personally identifiable. We use this information about the number of visitors and their use of the sites in aggregate form to make our sites more useful and attractive to visitors.
- (iii) Our website is hosted by a cloud service provider and we may also use the services of other online service providers from time to time. Our service providers' use of cookies is not covered by our Privacy Policy.

(c) Website

- (i) Our website includes hyperlinks which enable access to third party websites. These third party websites are not subject to this Privacy Policy.
- (ii) We reserve the right to collect more extensive information about any attempted access to our website that raises security issues and make the appropriate disclosures to the relevant authorities.
- (iii) In addition to the above provisions, the following additional provisions apply to your use of our website:

(1) Automatic Collection of your Personal Information

When you visit our website, our Internet Service Provider automatically records the following information about you for statistical purposes:

- your server address;
- your domain name;
- date and time of your visit to our website;

- pages you accessed and the information or documents you downloaded; and
- the type of browser you used.

4.3 CCTV

Our use of CCTV is part of an ongoing crime prevention initiative, targeting crime and other risks to aviation safety and airport security. All footage captured by CCTV throughout the Airports is retained for a specific period, after which time it is deleted.

4.4 MARKETING/FEEDBACK

Personal information is also provided to us for marketing, research and development purposes or where persons accessing or using NQA's products or services provides information to us by way of the following:

- (a) customer feedback forms;
- (b) application forms for permits, licences, authorisations;
- (c) social media and other applications; and
- (d) through recording calls to certain airport operations and security telephone lines for security and/or safety purposes.

4.5 THIRD PARTIES

There may be occasions when we collect personal information about you from third parties we deal with, such as:

- (a) a service provider (includes Driver Partner/Ride Share company);
- (b) a customer airline or retail outlet;
- (c) in relation to security matters, a government department, body or law-enforcement agency;
- (d) a publicly available source; and
- (e) any other organisation conducting activities on our behalf.

We may also obtain information when you communicate with us through social media sites or using applications used by third parties (eg. through your smartphone). If you use this form of communication with us, we assume you have informed yourself of the ways such sites or applications collect and disclose your personal information to us and that you consent to that collection and disclosure and our collection for the purpose of your communication.

Where we collect personal information about you from a third person, we will take reasonable steps to ensure that you are aware that we hold such personal information and that it will be managed in accordance with this Privacy Policy.

5. NON-SUPPLY OF INFORMATION

Generally speaking, you are not obliged to provide us with personal information. However, failure to do so may impact on the services we can provide.

5.1 CHOOSING TO NOT SUPPLY INFORMATION

If you choose not to supply information appropriate to the task or service required, it may mean that we are unable to:

- (a) transact business with you;
- (b) process any application for the issue of an authority, licence, pass or permit; or
- (c) provide you with an appropriate level of service.

5.2 OPTING IN AND OUT

At the point we collect information from you, you may be asked to “opt in” to consent to us using or disclosing your personal information other than in accordance with this policy or any applicable law. For example, you may be asked to opt-in to receive further information or communications from our advertisers and supporters which do not fall into one of the categories described above.

You will generally be given the opportunity to “opt out” from receiving communications from us or from third parties that send communications to you in accordance with this policy.

For example, you will be given the option to unsubscribe from e-newsletters and other marketing or promotional material sent by us. You may “opt out” from receiving these communications by clicking on an unsubscribe link at the end of an email.

If you receive communications purporting to be connected with us or our services that you believe have been sent to you other than in accordance with this policy, or in breach of any law, please write to us at privacy@cairnsairport.com.au.

6. HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION

We will not use your personal information for purposes other than those set out below without your consent or unless that use is authorised under the *Privacy Act 1988* (Cth).

6.1 ACCEPTABLE USE

Personal Information we collect is generally used in any of the following ways:

- (a) to help us develop, improve, manage and administer all of the services we provide to you;
- (b) to ensure that our business systems are functional and reliable, which may include fulfilling legal obligations;
- (c) to process applications effectively for the issue of authorities, licenses, passes, permissions and permits (including ADAs, ASICs, and other identification cards);
- (d) to assess whether or not any authorities, licenses, passes, permissions and permits should be cancelled or suspended;
- (e) to maintain and manage airport operations and safety and security at the airport;
- (f) to conduct research & development and marketing activities including market research;
- (g) as part of the investigation and analysis of incidents or occurrences (including potential incidents and occurrences) which occur on or at any of our airports;
- (h) to investigate, respond to or defend claims made against, or involving, us;
- (i) to enforce a contract or agreement which we have with you;
- (j) such information as is necessary to help us to manage, control and/or mitigate any biosecurity or pandemic risks in the Workplace;
- (k) for commercial/private drivers (eg UBER, rideshare) to enable us to match, verify or connect your ID with the driver partner you are associated with;
- (l) to notify you of services, special offers, opportunities, products or benefits which we offer or any of our strategic alliance partners, customer airlines, tenants or associated organisations. If you do not wish to receive such information then you should inform us. Contact details are provided at the end of this Privacy Policy.

The personal information you provide to us will be retained only for as long as necessary to fulfil the purposes for which the information was collected or as required by law.

6.2 DISCLOSURE TO THIRD PARTIES

We do not share personal information with third parties except as necessary to provide our products or services or as required by law or other legal processes or with your consent, and we never sell your personal information.

Personal information we have collected may be transferred to third parties where it is necessary to meet the purpose for which you have submitted the information. By submitting data to us electronically, you are providing explicit consent to trans-border transmission of data collected via our website in accordance with section 6.4. Your personal information may therefore be disclosed to:

- (a) survey analysts, driver partners, car park operators and debt collectors;
- (b) in the case of information collected through your application for an ASIC or any other identification card, to government agencies from time to time such as the **Commonwealth Attorney-General's Department, Australian Security Intelligence Organisation or AusCheck, the Australian Federal Police, the Australian Customs and Border Protection Service**, the Australian Department of Immigration and Citizenship, and the Queensland Police for security, law enforcement, customs and immigration purposes;
- (c) to our contractors (for the purpose of the services which they provide) so that we can complete a transaction on your behalf or provide you with a service that you have requested;
- (d) where required by law, including under a subpoena issued by a court;
- (e) Australian Tax Office;
- (f) to law enforcement agencies for law enforcement or safety purposes; or
- (g) to any other entity or person for the operational purposes for which the information was collected.

6.3 DIRECT MARKETING

We may also use your personal information to contact you to provide you with information about our products and services and safety information through our direct marketing systems. You may opt out of receiving such promotional material at any time by contacting us including in accordance with the information provided in the marketing communications.

6.4 OVERSEAS TRANSFER OF PERSONAL INFORMATION

We use service providers that have servers located overseas (Oregon, USA) including social media and cloud service providers. This means that your personal information supplied to us through our website or our social media sites may sometimes be transferred overseas.

If you elect to provide personal information to us through any of our online services you are deemed to consent to the overseas transfer of such information.

Apart from the above we will only transfer your personal information overseas if:

- (a) we are required to do so by law;
- (b) we reasonably believe that the recipient will be required to uphold privacy principles which are similar to the Australian Privacy Principles;
- (c) you have consented to the transfer;

- (d) it is not practical to obtain your consent or the transfer is for your benefit and your consent is likely to be given;
- (e) the transfer of the information is necessary for the performance of a contract between you and us; or
- (f) we have taken reasonable steps to ensure that your personal information will not be held, used or disclosed by the overseas recipient which does not comply with the Privacy Act and/or the Australian Privacy Principles.

7. SECURITY OF YOUR PERSONAL INFORMATION

We are committed to protecting your personal information as outlined under the *Privacy Act 1988* (Cth).

7.1 SECURING YOUR INFORMATION

We take reasonable steps to protect your personal information from loss, unauthorised access, use, modification or disclosure, and against other misuse.

Among other things, we safeguard our IT systems against unauthorised access, and ensure that paper-based files are secured. We also ensure that access to your personal information within our systems is only available to our staff who need to have access in order to do their work.

7.2 DATA SECURITY

When the personal information we collect is no longer required, we delete or destroy it in a secure manner, unless we are required to maintain it because of a law, regulations or court or tribunal order.

8. ACCESS TO YOUR PERSONAL INFORMATION

8.1 CORRECTION

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. We may ask you to inform us of any changes to your personal information.

You can contact us at any time to update your information as and when required. You can also advise us of changes by e-mail, telephone or letter.

8.2 ACCESS

In certain instances we may not be required or able to provide you with access to or to correct your personal information. If this occurs we will give you reasons for our decision not to provide you with such access or correction of your personal information.

All requests for access and/or correction will be processed within a reasonable time. In some situations, you may be able to access and correct your personal information directly through our website.

There is no application fee for making a request to access your personal information. However, we may charge an administrative fee for the provision of information in certain circumstances such as if you make repeated requests for information or where the information is held by a third party provider.

9. COMPLAINTS

We recognise our responsibility for protecting the privacy of your personal information. If you have questions or comments about our administration of your personal information, please contact us at the contact details below. You may also use these contact details to communicate any concerns you may have regarding compliance with our Privacy Policy.

If you are not satisfied with how we handled your complaint, you can lodge a complaint with us or with the Office of the Australian Information Commissioner at:

Telephone 1300 363 992 (or +61 2 9284 9749 if calling from outside Australia).

TTY 133 677 (then ask for 1300 363 992)

Post GPO Box 5218 Sydney NSW 2001

Facsimile +61 2 9284 9666

Email enquiries@oaic.gov.au

Website www.oaic.gov.au

10. CONTACTING US

If you have any questions, concerns or complaints about this Privacy Policy or our information handling policies you should contact us at:

Privacy Officer

North Queensland Airports Group

PO Box 57 Airport Administration Centre

Cairns Airport QLD 4870

Telephone (07) 4080 6703

E-mail: privacy@ Cairnsairport.com.au ; privacy@ Mackayairport.com.au

TYPES OF PERSONAL INFORMATION WE COLLECT

<p>General Commercial & Operational Dealings</p>	<ul style="list-style-type: none"> (a) your name, credit card details, income levels, age, gender, country of origin, citizenship/VISA status, email address, residential or business address, telephone numbers, date of birth, employment details, social media account details, flight details and driver’s licence number; (b) photographs, recording of your image on Closed Circuit Television (CCTV) or voice recording through calls made to or by NQA; (c) any correspondence entered into between you and Us, including competitions or responses to marketing; (d) other information reasonably required to ensure your safety and security at an NQA airport and to ensure the safe and secure operation of the NQA airports; and/or (e) information which is required to complete business transactions with NQA which may include credit card details or your vehicle registration; (f) information that may be required to facilitate your travels through an NQA airport including flights details, passport numbers, visa information, car parking; (g) information for safety, security and insurance purposes in order to be compliant with our legal obligations; (h) your spending habits and preferences, your country of disembarkation, your travel destinations, the time of your entry/exit from our car parks and our Premises, when you utilise any number of our apps, QR Codes, and other social media applications (for example, Who is On Location); (i) [#your location and/or vaccination status but then, only to the extent necessary for us to comply with our WHS obligations, legal requirements, and Health Directive, and to manage any risks of an infection or outbreak in the workplace or to reduce/mitigate a bio-security risk or pandemic risk at the Airports]. [## under Legal Review]
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<p>Security or Airfield Operations</p>	<p>In the case of matters relating to security or airfield operations - for example, applications for an Aviation Security Identification Card (ASIC), other forms of identification card or an Authority to Drive Airside (ADA) made to or via us, we may collect additional personal information in order to manage and administer our business systems and comply with our legislative obligations.</p> <p>Where we issue identification cards, permits, licences, passes, permissions or authorities, we are required to collect personal information which may include sensitive personal information in order to assess applications received. This additional information may include:</p> <ul style="list-style-type: none"> (a) your place of birth, country of citizenship and gender; (b) your photograph, CCTV footage or other identifying imagery; (c) criminal history report and searches (d) other information necessary or relevant to the security of our operations at the airports. <p>In the case of applications for an ASIC or other form of identification card, your previous residential addresses for the last 10 years, details of previous criminal offences, details of any pending prosecutions, and information provided to us by relevant government agencies (such as the outcome of criminal records checks, security assessments and immigration checks), is likely to be required.</p> <p>Photographs or CCTV footage are collected by us or our contracted service providers so that we may monitor transport security, the flow of passengers and freight through the airports and to assist us in the detection of any suspicious behaviour that may jeopardise the safety or comfort of the passengers and persons at the airport.</p>
<p>Retail and Marketing Related Matters</p>	<p>In the case of retail and marketing-related matters, we may collect additional information such as:</p> <ul style="list-style-type: none"> (a) your preferences concerning types of goods, products or services; (b) the frequency of use of certain types of goods, products or services; (c) the reasons, methods, purpose and frequency of travel; (d) your preferred destinations; (e) your income and demographics; and (f) any further information you choose to disclose to us. <p>Personal information is collected for marketing matters to assist us to provide our services to our customers. In addition, personal information collected for marketing research purposes allows us to improve and build on the services that we provide so that our customers contact with the airport is managed appropriately.</p>

Document Control

Reference No	Version	Status	Sponsor	Author
7006 FIN	6	For Approval	Chief Executive Officer	General Counsel and Company Secretary

Amendments	Date	By whom
Version 6 – updated formatting to remove drafting notes	09/10/2023	Legal Counsel (approved CFO)
Version 6 – wholesale review and updates	08/9/2021	GCCS
Version 5 – new clause 8 inserted in relation to Mandatory Data Breach requirements	26/03/2018	Chief Financial Officer
Version 4 – no changes required during this annual review	01/10/2016	Chief Financial Officer
Version 3 – Annual Review	01/10/2015	Chief Financial Officer
Version 2 – Annual review inclusive of new document identifier and number in footer as per Document Control procedure	01/10/2014	Chief Financial Officer
Version 1 – Annual Review	11/03/2014	Chief Financial Officer
Summary		
Document created to capture Privacy Policy for NQA.		