



PRIVACY POLICY

<i>Custodian</i>	<i>Approved By</i>	<i>Date Approved</i>
Chief Financial Officer	Mark Hope	28 May 2018 V2

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1. EXECUTIVE SUMMARY

North Queensland Airports Group (“We, Our, Us”) owns and operates Cairns and Mackay Airports. NQA is committed to managing the privacy and confidentiality of your personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth), the Privacy Amendment (Notifiable Data Breaches) Act 2017 and the European Union General Data Protection Regulation (the ‘GDPR’).

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

We are subject to a number of laws and regulations including the following in relation to obtaining and holding personal identifiable information:

- the Commonwealth *Privacy Act 1988* and the Australian Privacy Principles (APPs) when collecting, using, disclosing, securing and providing access to personal information;
- the Privacy Amendment (Notifiable Data Breaches) Act 2017 (‘Act’) came into force on 22 February 2018. This Act places an obligation on relevant entities to notify individuals whose personal information is involved in a data breach that is likely to result in serious harm to those individuals; and
- the GDPR is a new data protection regulation which applies from 25 May 2018 and applies to establishments in the EU (regardless of whether they process personal data in the EU) or establishments that do not have an establishment in the EU, but offer goods and services or monitor the behaviour of individuals in the EU.

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 and are not intended to create a contract between us and any individual or entity that provides us with personal information.

2. COLLECTION OF PERSONAL INFORMATION

We may invite you to provide information about yourself so that we are able to provide our services at your request.

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, when you request services or make enquiries of us, when you use one of our Airports (including carparks) or when you otherwise do business with us e.g. apply for credit or enter into a contract with us.

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 personal information and we are required to ensure that sensitive personal information is only collected with your consent and that reasonable steps are taken to ensure the appropriate use, disclosure and protection of your sensitive personal 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 Australian Privacy Principles and if such information is necessary to provide our service to you, where we are required to collect this information by law, in an emergency, in dealing with an incident or in the conduct of an investigation.

We may also collect and use government identifiers where authorised to do so by law. Government identifiers include your tax file number. 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:-

- a) marketing to identify your needs so we can provide you with the appropriate service or product;
- b) statistical analysis;
- c) security and safety;
- d) dealing with queries (e.g. lost property, flight information);
- e) dealing with complaints;
- f) maintaining records;
- g) dealing with incidents;
- h) competitions;

- i) business arrangements; and
- j) 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.

3.1 GENERAL

Information we collect about you in general dealings could include but is not limited to:

- a) your name, address, telephone numbers, date of birth, employment details, flight details and your drivers 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 NQA 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;
- 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; and/or
- g) information for security and insurance purposes in order to be compliant with our legal obligations.

3.2 SECURITY & AIRFIELD OPERATIONS

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.

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:

- 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; and
- d) other information necessary or relevant to the security of our operations at the airports.

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.

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, to monitor operations 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.

3.3 *MARKETING, ADVERTISING & MEDIA*

In the case of retail and marketing-related matters, we may collect additional information such as:

- a) your preferences concerning types of products or services;
- b) the frequency of use of certain types of products or services;
- c) the 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.

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.

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, 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:

(A) *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 as well as monitoring our operational performance including passenger and freight flow. All footage captured by CCTV throughout the Airports is retained for a specific period, after which time it is erased.

4.4 MARKETING/COMPLAINTS

Personal information is also provided to us for marketing 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
- 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;
- 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 (e.g. 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 upon 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 and we will immediately investigate and where appropriate, address the issue.

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, the Privacy Amendment (Notifiable Data Breaches) Act 201, the GDPR or some other law.

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 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; and
- j) 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.

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 permitted or 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, as required by law, for other legal processes or with your consent. Furthermore, we will 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 or with your consent. By submitting data to us electronically, you are providing explicit consent to trans-border transmission of data collected via our website. Your personal information may therefore be disclosed to:

- a) survey analysts, car park operators, 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 such as under a subpoena issued by a court; and/or including Australian Tax Office;
- e) to law enforcement agencies for law enforcement or safety purposes; or
- f) to any other entity or person for the operational purposes for which the information was collected.

6.3 DIRECT MARKETING

We may also 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.

6.4 OVERSEAS TRANSFER OF PERSONAL INFORMATION

We use internet service providers that have servers located overseas, 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, the Privacy Amendment (Notifiable Data Breaches) Act 2017 and the GDPR.

7. SECURITY OF YOUR PERSONAL INFORMATION

We are committed to protecting your personal information as outlined under the Privacy Act 1988, the Privacy Amendment (Notifiable Data Breaches) Act 2017 and the GDPR.

7.1 SECURING YOUR INFORMATION

We have security measures designed to provide reasonable protection against misuse and loss, and from unauthorised access, interference or modification, disclosure or unintentional destruction. Such measures include:

- a) network segregation for sensitive information stored electronically, with access restricted to staff holding appropriate positions;
- b) firewalls and login password protocols for all information stored electronically;
- c) secure, access-controlled locations/premises;
- d) limited access locations for information stored as hard copy;
- e) taking reasonable steps to use global data centres which comply with United Kingdom, European Union, United States of America and Australian privacy laws;
- f) confidentiality provisions in all our employment and service contracts;
- g) provisions in all third party service contracts to ensure that the third party service provider manages information held or controlled by us in compliance with the Australian Privacy Principles and any other applicable legislation;
- h) maintaining registers of all visitors to any part of our premises where personal information may be stored, and such visitors being required to be accompanied by a member of our staff at all times;
- i) employing secure methods for the destruction or de-identification of personal information, which is undertaken when permitted by law and where we are no longer required to retain such information; and
- j) training our staff including those who have access to personal information to maintain the confidentiality of such information.

8. DATA SECURITY

We take reasonable measures 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.

If a data breach occurs, such as if personal information that we hold is subject to unauthorised loss, use or disclosure, we will respond in line with the Office of the Australian Information Commissioner's Data breach notification—A guide to handling personal information security breaches. We will aim to provide timely advice to you to ensure you are able to manage any loss—financial or otherwise—that could result from the breach. Where required by any other legislation, such as the GDPR, we will make the appropriate notification, when, and if, required by that legislation.

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 prudent business practices or a relevant law, regulation or court/tribunal order.

9. ACCESS TO YOUR PERSONAL INFORMATION

9.1 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.

9.2 ACCESS

- a) 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.
- b) 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.
- c) 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.

10. 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

11. 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 and Data Protection Officer
c/-Chief Financial 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