

# Privacy Policy



Responsible Area:	Legal and Governance	Approved by:	Board of Directors
Owner:	Legal Counsel	Approval Date:	November 2018
Author:	Legal Counsel	Review Date:	November 2019

## 1. POLICY STATEMENT

This Privacy Policy (Policy) applies to Queensland Airports Limited ACN 104 121 824 and its related companies (collectively referred to in this document as QAL, we, us, our or as the context otherwise requires), any QAL website and social media page. Where applicable, this Policy should be read together with our website Terms and Conditions and any location specific legal notice.

QAL is committed to protecting the privacy of all individuals we interact with. The purpose of this Policy is to provide a general overview of QAL's handling of personal information collected from third parties, and to explain:

- why we collect your personal information;
- how personal information is gathered;
- what type of personal information is collected;
- how your personal information is stored;
- whether your personal information is disclosed to anyone else; and
- your ability to access and/or correct your personal information held by QAL.

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable. It does not include information that has been de-identified (anonymous data).

Our businesses and websites operate from Australia and this Privacy Policy provides information in accordance with our obligations under the Privacy Act 1989 (Cth) (Privacy Act), including the Australian Privacy Principles (APPs) and any applicable privacy regulations.

## 2. YOUR ACKNOWLEDGEMENT AND CONSENT

By visiting or using one of the QAL websites and/or providing personal information to us (either directly or allowing another person to do so on your behalf), you acknowledge and consent to QAL collecting and handling your personal information in accordance with this Policy and/or any other specific QAL policy applicable to the specific circumstances. If you do not agree with any part of this Policy, you must not provide your personal information to us.

If you do not provide your personal information to us, or if you withdraw any consent we are required by applicable law to have to process the personal information you have given us, this may affect our ability to provide services to you.

### **3. OVERVIEW OF PROCESS AND PROCEDURES**

#### **3.1. Why we Collect Personal Information**

The kind of personal information we collect and hold about an individual, and our use of that information, largely depends upon our relationship and dealings with that person.

We may collect your personal information for the following purposes:

- to confirm your identity;
- to contact you about a service you have enquired about or purchased;
- to provide you with a service, including processing your payment and ongoing customer service;
- to notify you about special offers, products or services available from us, whether the notice comes from us directly or from a third party advertising service;
- business planning, research development and marketing strategy;
- fulfilling any mandatory reporting obligations required by applicable law, including communication with and notifying you where a notifiable data breach has occurred in relation to your personal information;
- to respond to a commercial enquiry such as leasing a property, or complete a commercial transaction;
- to assess your application for a role with us and to take references;
- to assess your application for an ASIC registration;
- for safety, operations, emergency and security purposes;
- any related secondary purpose which we believe you would reasonably expect when we collected your personal information or as a result of our ongoing relationship with you;
- any purpose for which you have consented;
- any purpose for which we are required or authorised by applicable law; and
- to respond to and manage inquiries, complaints, feedback and claims, defend our legal interests and investigate and protect against fraud, theft and other illegal activities.

#### **3.2. How we collect your Personal Information**

We will only use and disclose personal information for the purposes for which we collected it.

We mostly collect personal information through the following methods:

- electronic monitoring systems (e.g. CCTV, access systems);
- when you sign up for our mailing lists, subscribe to our e-newsletters, or participate in marketing activities and promotions;
- when you purchase or use a product or service, such as carparking;
- If you contact us with your opinion, feedback or questions in relation to our businesses or services;
- if you apply for a job vacancy or volunteer position with us or via any third party recruitment service we use;
- if you apply for an ASIC registration; or
- through third party channels (such as social networking sites or contractors who perform services on our behalf).

### 3.3. What type of personal information do we collect

At QAL we may collect the following personal information:

- your name, date and country of birth, gender, and/or contact details;
- your flight details and passport number, and/or citizenship details;
- your CV and other employment information required to assess your application and to retain for human resources purposes;
- your vehicle licence plate number and credit card details;
- recordings of your image on our closed circuit television system (CCTV);
- personal information provided as part of an ASIC application process going back 10 years;
- your product and service preferences including services used;
- device specific information;
- location/ wayfinding information;
- log information, cookies and similar technologies; and/or
- travel companions and reason for and frequency of travel.

### 3.4. Special types of information we may collect

When required, we may collect the following types of information from you:

- (a) **financial information:** we may collect, store and use your financial, payment or credit card information via our website or through our sales facilities to facilitate the transaction and bill you for services. Financial information we collect from you is strictly confidential and held on secure servers in controlled facilities.
- (b) **sensitive information:** we generally do not collect any sensitive information unless it is reasonably necessary for our functions or activities and you have explicitly consented. The circumstances in which we may collect sensitive information may include:
  - i. during recruitment for an employment or volunteer position; or
  - ii. as part of your use of our airport serviceswhere we may need to collect your health and/or disability information, and immigration status.

### 3.5. Dealing with us anonymously or under a pseudonym

Where possible and lawful, you may interact with us anonymously or using a pseudonym. For example, if you contact us with a general question we will not record your name unless we need it to adequately handle your question.

However, for many of our functions and activities we usually need your name, contact information and other details.

### **3.6. Storage, security and disposal of personal information**

We may hold personal information in various forms which could include electronic format or in hard copy. We will always take reasonable steps to securely store personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss.

We take reasonable steps to destroy and/or permanently de-identify personal information when we no longer require it for the purpose for which it was collected or where we received information about you that we did not request (unsolicited personal information) and we determined that we could not have lawfully collected that information.

The practice of transferring data over the internet is recognised as having inherent risks associated with it, notwithstanding that preventative measures having been put in place. As such, we encourage you to be vigilant about protecting your own personal information when using digital services, such as social media.

## **4. Disclosure and sharing of your personal information**

### **4.1. Sharing your personal information**

We only disclose personal information to other individuals or organisations for the purpose for which we collected it and to those parties involved in providing, managing or administering the product or service that we are providing to you. These include:

- organisations that provide services to you on our behalf e.g. security contractors;
- organisations that promote our products or services e.g. airlines, service providers;
- organisations that provide technical services to us to maintain, review, research and develop our business systems and social media platforms;
- organisations that provide goods or services within our airports; and
- professional advisors if permitted or required by law e.g. accountants, auditors, insurers, lawyers.

We also provide information to various parties where authorised under the Privacy Act or some other law. These include:

- enforcement agencies e.g. the Australian Federal Police, Queensland Police, Customs, Attorney Generals Department, Immigration Departments; and
- entities or regulatory bodies conducting audits, reviews, investigations or managing claims or disputes e.g. Department of Infrastructure & Regional Development (Cth), CASA, Air Services Australia, WorkCover, Courts having Jurisdiction over QAL or QAL businesses.

QAL may share your personal information with its related entities upon the same terms as that personal information was collected, provided that the sharing of personal information between QAL entities is consistent with, and necessary for, the original purpose for which it was collected.

If we merge with or are acquired by another entity, your personal information may be transferred to that entity as a part of the merger or acquisition.

We may also provide de-identified data, obtained from your personal information, to partner research and educational institutions located in Australia as part of our commitment to develop and improve our services to you.

We endeavor to ensure that any recipient of personal information collected by QAL implements appropriate measures to protect your personal information and abide by this Policy and QAL's obligations under the Privacy Act.

#### **4.2. Overseas disclosure**

Whilst QAL is committed to ensuring that all personal information collected by us is not shared with an entity located overseas, we do send de-identified personal data to the Airports Council International which is located in Montreal, Canada or other industry representatives.

We also use cloud services to store data, which may include personal information. Where possible, we use cloud servers which are located within Australia.

Where we send personal information overseas, we ensure that the recipient country has privacy legislation equivalent to the protections found under the Privacy Act, and that the recipient entity is bound by this legislation.

#### **4.3. CCTV Footage**

QAL may collect closed circuit television footage (**CCTV footage**) of you when you enter or access QAL owned, leased or operated sites including but not limited to airport terminals and car parks. The CCTV footage QAL collects may include video, audio or photography which can reasonably identify you and qualify as personal information under the Privacy Act. QAL may disclose CCTV footage (including where it contains personal information that is not de-identified) to third parties for the following purposes:

- (a) to third party security providers for the purpose of security and surveillance of QAL sites;
- (b) to law enforcement agencies for the purpose of investigating and/or prosecuting criminal activity, locating missing persons, or as otherwise required by law; or
- (c) to research partners for the purpose of research and analysis projects to improve QAL security operations and customer experience.

#### **5. Credit card information**

We sometimes use third parties, such as ADVAM (Payment Gateway) to collect your credit card details and process payment for our services (either via our website or at one of our locations (such as car parking booths)).

Where we use a Payment Gateway to process a payment via credit card, we do not directly hold any payment information other than a billing address and contact details on the website servers.

In accordance with the Payment Gateway policies, we may be able to view credit card details, however, we will only use such information for the purposes of credit card verification, transaction approval or to provide a refund. Any information collected by the Payment Gateway may be used in accordance with the Payment Gateway privacy or other policies and is beyond our control.

To view the Payment Gateway policies please refer to: <https://advam.com/privacy/privacy-policy/>.

## **6. Direct marketing**

We may use your personal information to identify a product or service that you may be interested in or to contact you about (for example a promotion or offer). We may with your consent where required by applicable law, use the contact details you have provided to contact you from time to time whether by phone, email, SMS or post to tell you about new services and special offers that we believe may be of interest to you.

You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list (by clicking 'unsubscribe' in any email from us) or by using any unsubscribe facility available in the electronic communication you receive (where available), or by contacting our Privacy Officer on the details at the end of this Privacy Policy.

## **7. Data breaches**

The Privacy Act requires us to notify affected individuals and the Privacy Commissioner about 'eligible data breaches'. An eligible data breach occurs when the following criteria are met:

- (a) there is unauthorised access to or disclosure of personal information we hold (or information is lost in circumstances where unauthorised access or disclosure is likely to occur);
- (b) the access, disclosure or loss is likely to result in serious harm to any of the individuals to whom the information relates; and
- (c) we are unable to prevent the likely risk of serious harm with remedial action.

If it is not clear whether a suspected data breach meets these criteria, we will investigate and assess the breach to determine whether the breach is an 'eligible data breach' that requires us to notify the affected individuals. This is to ensure you are notified if your personal information is involved in a data breach that is likely to result in serious harm. Even if the criteria are not met, we may decide it is appropriate to notify you as part of our commitment to taking privacy seriously.

## **8. Spam**

Spam is an electronic message that is both unsolicited and commercial in nature. We confirm:

- (a) we have crafted an internal policy to educate our staff and implement clear guidelines and rules on commercial electronic messages;
- (b) you are free to unsubscribe from any mailing list to which you have previously subscribed, either by using the opt-out facility provided in the message or by contacting our Privacy Officer;
- (c) we will not use address-harvesting software for any reason.

To assist us in combating spam, we ask:

- (a) if you receive an unauthorised commercial or offensive message which appears to originate from our email address, notify our Privacy Officer immediately;
- (b) if you decide you no longer wish to receive commercial messages from us or our contracted third parties, you unsubscribe from any of our mailing lists; and

- (c) if you do subscribe to any of our mailing lists and your contact details change, please contact us to update your contact details.

## **9. Website and online software data**

### **9.1. Cookies**

Most commercial websites use cookies. Cookies are data that a website transfers to an individual's browser and are stored in their hard drive and are used to track your ongoing access to and use of the website.

We use cookies, web beacons and measurement software and tools on our website and so do our services providers and third parties such as our analytics, advertising or ad serving partners. We use and disclose the information collected through the use of cookies, web beacons and measurement software and tools in accordance with this Policy. This includes using the information to report statistics, analyse trends, administer our Services, diagnose problems and target and improve the quality of our Services.

We may combine our cookies, information collected through the cookies and web beacons on our website with other information and use analytics services to provide better or more relevant services and advertising to you on our or third party websites.

If you would prefer not to receive cookies, you can alter your security settings on your web browser to disable cookies or to warn you when cookies are being used. However this may mean you may not be able to take advantage of all features of the website.

### **9.2. Google Analytics**

Every time you use our website, information may be collected by us or on our behalf via services such as Google Analytics. This includes information such as:

- (a) your server IP address and domain name of your internet service provider;
- (b) the type of browser and operating system you use;
- (c) pages accessed;
- (d) the date and time of your visit;
- (e) any address of a recurring site and any other website you are about to visit; and
- (f) the information you submit regarding payment particulars, including credit card details which are captured by our online software and database.

This information is used to provide statistical reporting on the use of our website, including the frequency and duration of visits, and which web pages you have accessed on our website.

## **10. Dealing with us in relation to your personal information and privacy**

### **10.1. Access and correction of your personal information**

We will endeavor to ensure that the personal information collected from you is up to date, accurate and complete. You may request that QAL provide you with access, or corrects, the personal information we hold about you. Generally, we will provide you with such access, except in very limited circumstances where the Privacy Act or some other law prohibits us. Grounds for refusing a request could include that it will unreasonably affect someone else's privacy or pose a serious threat to someone's life, health or safety.

Where such a request is made, it must be in writing and directed to QAL's Privacy Officer whose details are set out below. Under the Privacy Act, QAL is permitted to charge the individual making the request a reasonable fee for providing access to their personal information.

## **10.2. Making a complaint relating to privacy**

You may lodge a complaint with QAL if at any time, you believe that QAL has handled your personal information other than in accordance with the Privacy Act. To do this, please contact QAL's Privacy Officer in writing via the contact details set out in this Privacy Policy and provide details of your complaint.

QAL will confirm receipt of the complaint and set out the time frame we require to investigate and provide a response. We will endeavor to respond as quickly as possible to any complaint received and generally, this will be within 14 days of receiving the complaint.

If you are not satisfied with our response, you may complain directly to the Office of the Australian Information Commissioner (OAIC) via the OAIC website: [www.OAIC.gov.au](http://www.OAIC.gov.au).

## **10.3. Changes to our Privacy Policy**

QAL may amend, modify or replace this Policy from time to time. You should review QAL's Privacy Policy each time you visit one of QAL's websites or provide us with personal information. Any revised Privacy Policy will apply both to information we already have about you at the time of the change, and any personal information created or received after the change takes effect.

## **10.4. Contacting us**

If you would like further information about the way QAL manages personal information or have a privacy-related complaint, please contact QAL's Privacy Officer at the following address:

QAL Privacy Officer  
C/- Company Secretary  
Queensland Airports Limited  
Level 1, Airport Central  
1 Eastern Avenue  
Bilinga QLD 4225  
Australia  
Telephone: +61 7 5589 1100  
Email: [governance@qldairports.com.au](mailto:governance@qldairports.com.au)

## **10.5. Office of the Australian Information Commissioner**

If you require more information about your rights and QAL's obligations in relation to privacy or personal information, we suggest that you contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

<b>Version No.</b>	<b>Key Changes</b>	<b>Date</b>
1	Original Policy	01 July 2014
2	Review and update	22 June 2016
3	Review and update	1 November 2018