

## CCTV Privacy Policy

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### 1. Introduction

1. Palmerston North Airport Limited (PNAL) operates an extensive aerodrome-wide closed-circuit television (CCTV) system in which data, including capturing of 'personal information' as defined by the Privacy Act 2020 is recorded on a 24 hours / seven days per week basis, and at times used, stored, and/ or disclosed.
2. CCTV cameras are not placed in areas where a high reasonable expectation of privacy is implicit such as public bathrooms/toilets, office areas (excluding reception), and staff rooms.
3. Signage exists at primary entry points into the aerodrome indicating that CCTV cameras are operating.
4. CCTV information is collected by way of digital visual recording, not audio. Except for footage downloaded for authorised purposes, this information is held for a period of up to three months at which point it is automatically overwritten.
5. All information is stored locally on hard disk drive unless it has been approved for release to third parties.
6. CCTV information is used for authorised purposes only which includes;
  - i. Monitoring of the safety and security of employees, contractors, tenants, visitors, airside users, and passengers.
  - ii. Detecting unauthorised incursions airside.
  - iii. Security monitoring of sensitive areas within the aerodrome.
  - iv. Monitoring of the airfield for the purposes of tracking aircraft and ground vehicle movements.
  - v. Monitoring of the airfield for wildlife and foreign object debris (FOD).
  - vi. Monitoring of carparks & roadways for safety, security, commercial, capacity and congestion reasons.
  - vii. Safety, security or insurance investigations be they internal or by an external agency.
  - viii. Training of personnel where the footage can be used as a training aid.
7. The use of the CCTV system for activities outside authorised purposes is not permitted, such as an employee 'browsing' footage for no legitimate reason.
8. PNAL employees are reminded to refer to their individual employment agreements for further information relating to what constitutes the authorised use of PNAL's electronic media and confidential information.
9. When viewing footage, authorised PNAL employees must be mindful of their surroundings and ensure no unauthorised persons can view the footage being reviewed.

## 2. PNAL Authorised Users

- i. Chief Executive
- ii. Safety & Operations Manager
- iii. Airfield Operations Manager
- iv. Terminal & Facilities Manager
- v. Customer Service Executive
- vi. Ground Transport & Facilities Coordinator
- vii. Terminal Operations Officers (Contractors)
- viii. Rescue Fire Officers
- ix. Other roles as approved by the Chief Executive.

## 3. CCTV Footage Access and Requests

1. The Privacy Act 2020 provides individuals with the right in some circumstances to ask for access to CCTV footage PNAL may have which includes your personal information. In other instances, an application outside of the Privacy Act may also be made for access to CCTV footage.
2. Requests for release of footage must be made using the attached Application Form and emailed to [info@pnairport.co.nz](mailto:info@pnairport.co.nz) using the subject line: Request for CCTV Footage.
3. All requests must contain the following information:
  - i. The name of the agency or person requesting the recording.
  - ii. The contact details of the requestor.
  - iii. The details of the information requested including exact location, plus the time and date the recording took place.
  - iv. The purpose for which the recording is required.
  - v. If applicable, the relevant legislation that applies.
4. Any employee of PNAL must obtain prior approval of the Safety & Operations Manager, Terminal & Facilities Manager, or Chief Executive before providing any access to outside agencies or persons of PNAL CCTV footage.
5. Subject to legislative requirements, the approval to release any footage will be at the discretion of the above managers, who will respond in writing within 20 working days of a request being received as to whether the request will be granted or not and any conditions that may be placed on a granted request.
6. In considering whether to release the information relevant factors include;
  - i. The purpose of collection by PNAL
  - ii. The purpose for the request
  - iii. Ease of access of the footage
  - iv. The extent to which there is a need to protect the privacy of third parties
  - v. The alignment with PNAL's Privacy Policy
  - vi. Other matters as set out in the Privacy Act, its subordinate legislation and other legislation where relevant.
7. Any footage supplied will be restricted to that relevant to the request i.e., the specific camera rather than the entire area and may be at PNAL's discretion altered/blurred out etc to remove other persons personal information/confidential information that is not relevant to the access request.
8. The original footage must be copied prior to the alteration taking place and that original footage is secured for evidential purposes should it be necessary to produce that version.
9. PNAL may charge a reasonable fee for providing footage to third parties.
10. A register will be maintained recording the details of requests received, and any footage released.

#### **4. Complaints**

1. You can notify PNAL of any complaint you have around an access request decision. This can be addressed to [info@pnairport.co.nz](mailto:info@pnairport.co.nz) using the subject line: Attention Privacy Officer CCTV Complaint.
2. Where an access request made under the Privacy Act 2020 is refused, or you are otherwise dissatisfied with the decisions relating to your request you can make a complaint to the Privacy Commissioners Office which should be made as soon as practicable.

#### **5. Policy Compliance and Audit**

1. The Privacy Officer will be responsible for the oversight and audit of the use of the CCTV system including any information releases by authorised PNAL employees to ensure compliance with this Policy.

#### **6. Other Related Policies**

- Privacy Policy

#### **Approval Date**

Last Update: 09 February 2023

This version will be reviewed by the Board no later than December 2023