

CCTV Privacy Policy

Updated: 25 June 2026

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1. Introduction

- 1.1 Palmerston North Airport Limited (PNAL) operates an extensive aerodrome-wide closed-circuit television (CCTV) system in which footage, including capturing of 'personal information' as defined by the Privacy Act 2020 is recorded on a 24-hour / seven days per week basis, and at times used, stored, and/or disclosed. In addition, other recording devices, including but not limited to Licence Plate Recognition (LPR) software, mobile phones and cameras may also be used.
- 1.2 CCTV cameras or other recording devices are not placed or used in areas where a high reasonable expectation of privacy is implicit such as public bathrooms/toilets, office areas (excluding reception), and staff rooms.
- 1.3 Signage exists at primary entry points into the aerodrome indicating that CCTV cameras are operating.
- 1.4 Footage 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 approximately three months at which point it is automatically overwritten.
- 1.5 All footage is stored locally on hard disk drive unless it has been approved for release to third parties.
- 1.6 Footage is used for authorised purposes only which include;
 - a) Monitoring of the safety and security of Employees, volunteers, contractors, tenants, visitors, airside users, and passengers.
 - b) Detecting unauthorised incursions airside.
 - c) Security monitoring of sensitive areas within the aerodrome.
 - d) Monitoring of the airfield for the purposes of tracking aircraft and ground vehicle movements.
 - e) Monitoring of the airfield for wildlife and foreign object debris (FOD).
 - f) Monitoring of carparks, roadways, and all airside areas for reasons including safety, security, enforcement, commercial, capacity, and congestion purposes.
 - g) Safety, security, or insurance investigations be they internal or by an external agency.
 - h) Supporting the investigation and management of workplace related matters, including compliance with organisational policies, employment obligations and operational procedures.
 - i) Training of personnel where the footage can be used as a training aid.
- 1.7 The use of the CCTV system or other recording devices for activities outside authorised purposes is not permitted, such as an Employee 'browsing' footage for no legitimate reason.

- 1.8 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.
- 1.9 When viewing footage, authorised PNAL Employees must ensure no unauthorised persons can view the footage being reviewed.

2. PNAL Authorised Users

- a) Chief Executive
- b) Safety & Operations Manager
- c) Airfield Operations Manager
- d) Terminal & Facilities Manager
- e) Airport Terminal Supervisor
- f) Terminal & Facilities Support Coordinator
- g) Ground Transport & Facilities Coordinator
- h) Terminal Operations Officers
- i) Rescue Fire Officers
- j) Other roles as approved by the Chief Executive

3. CCTV Footage Access and Requests

- 3.1 The Privacy Act 2020 provides individuals with the right, in some circumstances, to ask for access to CCTV and other footage that PNAL may have which includes their personal information. In certain other instances, an application outside of the Privacy Act may also be made for access to this footage.
- 3.2 Requests for the release of footage must be made using the Application Form (Appendix A) and emailed to info@pnairport.co.nz using the subject line: Request for CCTV Footage.
- 3.3 All requests must contain the following information:
 - a) The name of the agency or person requesting the recording.
 - b) The contact details of the requestor.
 - c) The details of the information requested including exact location, plus the time and date the recording took place.
 - d) The purpose for which the recording is required.
 - e) If applicable, the relevant legislation that applies.
- 3.4 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 footage.
- 3.5 Subject to legislative requirements, the approval to release any footage will be at the discretion of the Safety & Operations Manager, Terminal & Facilities Manager, or Chief Executive, 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.
- 3.6 In considering whether to release footage relevant factors include;
 - a) The purpose of collection by PNAL
 - b) The purpose of the request
 - c) Ease of access of the footage
 - d) The extent to which there is a need to protect the privacy of third parties
 - e) The alignment with PNAL's Privacy Policy
 - f) Other matters as set out in the Privacy Act, its subordinate legislation, and other legislation where relevant.
- 3.7 Any footage supplied will be restricted to that relevant to the request i.e., the specific camera rather than the entire area and may, at PNAL's discretion, be altered/blurred out, etc. to remove other persons' personal information/confidential information that is not relevant to the access request.

- 3.8 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.
- 3.9 PNAL may charge a reasonable fee for providing footage to third parties.
- 3.10 A register is maintained to record the details of requests received and footage released. Information is retained on this register for as long as necessary to demonstrate compliance with the Privacy Act 2020 and PNAL's operational and reporting requirements. Records are therefore retained for a minimum of three years, after which they are securely disposed of, unless required for an ongoing investigation, complaint or legal process.

4. Complaints

- 4.1 You can notify PNAL of any complaint you have about an access request decision. This can be addressed to info@pnairport.co.nz using the subject line: Attention Privacy Officer CCTV/Footage Complaint.
- 4.2 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 Office of the Privacy Commissioner which should be made as soon as practicable.

5. Policy Compliance and Audit

- 5.1 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/Legislation

- Privacy Policy
- Health, Safety, Security & Wellness Policy
- IT Security & Acceptable Use Policy
- Privacy Act 2020

Approval Date

Last Update: 25 June 2026

This version will be reviewed by the Board no later than June 2029

Appendix A: Application for Access to CCTV Footage

Palmerston North Airport Limited (PNAL) uses CCTV systems for the purposes outlined in our CCTV Privacy Policy.

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 2020 can be made for access to CCTV footage. To request access to CCTV footage, complete this form and return to Palmerston North Airport Limited via email info@pnairport.co.nz using **Subject Line: Request for CCTV Footage**, or mail to: Palmerston North Airport Limited, PO Box 4384, Palmerston North 4442.

PERSON or ENTITY MAKING THE REQUEST

Name	
Address	
Contact Phone Number	
Email	

DETAILS OF CCTV FOOTAGE REQUESTED

Date and estimated time	
Aerodrome location	
Purpose or request	

By signing this form I acknowledge that any footage accessed will only be used within the terms and purposes of PNAL's CCTV Privacy Policy or as otherwise provided for by law.

Signature	
Name	
Date	

Once we receive your completed form we will respond within 20 working days as to whether the request will be granted or not and any conditions that may be placed on a granted request.

You can notify PNAL of any complaint you have around an access request decision. This can be addressed to info@pnairport.co.nz using the subject line: Attention Privacy Officer CCTV Complaint. 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. The Complaint should be made as soon as practicable. Information on making a complaint can be found at www.privacy.org.nz

PNAL Use only		
Reference Number		
Request Approved/ Declined		
Reason if declined		
Signature / Name		
Date		