

Avdata New Zealand Privacy Policy

As at 13 June 2023

Avdata New Zealand Limited provides billing, data reporting, monitoring and access control services for airports across New Zealand. Avdata is engaged by the owners of facilities (councils, businesses or other organisations) to provide these services.

Our privacy commitment

We are committed to protecting the personal information of the owners and users of these facilities in accordance with the New Zealand Privacy Principles (NZPPs) contained in the *Privacy Act 2020* (available at legislation.govt.nz).

What information do we collect?

The information we collect depends on which facilities you use.

- We may collect your name, contact details (personal and business addresses) email and phone numbers.
- We may collect your business name and contact details.
- We may collect details of your aircraft registration.
- We may collect credit card details for customers who elect to settle accounts using this
 payment method (these are deleted after use unless you have explicitly requested that we
 keep them).
- We may collect information related to your financial relationship with us, such as your payment history, your credit history and information about bankruptcy or business insolvency.
- We may collect information about your use of airports for which Avdata provides a billing or data collection service.
- We may collect information about your use of other facilities for which we provide an Avdata key access control and / or billing service.

How we collect your information

- We may collect your information when you give it to us directly when you or your representative contacts us, including through our website.
- We may collect your information from the owners of the facilities you use or their authorised agents, generally when you make an application to use the facility.
- We may collect identity and contact information for aircraft owners and/or operators from airports, aircraft owners and operators, and published aircraft registers.
- We may collect information when you use facilities, for example landing your aircraft at an airport serviced by Avdata.
- We may collect information from persons or businesses appointed to manage bankruptcies or businesses liquidations relevant to billing services provided.

 We may collect information from online publicly available information where we have been unable to identify or contact you using the details you, the facility, or the aircraft register have provided.

Note:

We are generally unable to deal with customers anonymously, apart from general inquiries.
 Specific information about facility usages and billing can only be provided to identified individuals.

How do we keep your information?

- We may store your information in hard copy or electronic format, and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by other businesses contracted to process and store data for us.
- We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure. Our contractors meet our information security requirements.

How do we use your information?

- We identify your use of facilities, issue invoices for your use of facilities, resolve any technical or billing issues with your use of facilities, and provide you with information on behalf of facility owners.
- We may provide information to the owners of facilities or their authorised agents on the use
 of facilities by individuals and, in most cases, in relation to billing.

Note:

· We do not use your information for direct marketing.

When may we share your information?

- We may provide your information to you or, if you are running a business, to authorised individuals from your business.
- We may provide your information to councils, businesses and other organisations whose facilities you have used.
- We may provide your information to other individuals or organisations with your written consent, for example, billing in relation to the aircraft you own can be redirected to another operator or purchaser with consent from you and the operator specified in our redirection form.
- We may provide your information to debt recovery agencies if requested to do so by facility owners.
- We may provide your information to relevant government bodies (such as the Transport Accident Investigation Commission (TAIC), and New Zealand Police) to assist with emergencies and law enforcement.

Note:

We do not disclose your personal information to any direct marketing agency.

How can you access or correct your personal information?

- You can request a copy of your personal information by using the contact information for Avdata at the end of this document. Please specify the information you need.
 - There is no charge to submit a request or to correct information. We may apply an administrative charge for providing access to your personal information if the work involved for us to retrieve it is substantial.
- It is important to Avdata that your personal information is accurate and up to date. We have internal procedures to check the accuracy of information used for billing customers. We will attempt to contact you and / or facility managers if we believe that your personal information may be out of date, incomplete or inaccurate.
- You can also contact us in writing to update or correct your personal information.
- In some cases we will recommend that you contact the facility owner to access or correct particular personal information.

How can you make a privacy complaint?

- You can write to us to notify us of any privacy complaint you have against us. We aim to resolve any complaint promptly.
- If you are not satisfied with our handling of your complaint you may also be able to lodge a complaint with the New Zealand Privacy Commissioner (0800-803-909).

Contacting Avdata

- Please address correspondence to: Manager Accounts.
- · Mail to PO Box 13104 Christchurch 8141 NZ; or
- Email to <u>support@avdata.co.nz</u>; or
- Phone on (09) 884 6173 (during AEST business hours) alt: +61 2 6262 8111.