



CCTV Systems Privacy Policy for KINLOCH MARINA LTD

OVERVIEW

Kinloch Marina Ltd (KML) have a duty of care under relevant legislative responsibilities to take robust precautions to safeguard the security, safety, well-being and privacy of owners, users, renters, contractors and members of the public working in or visiting the Marina.

The protection of individual privacy is a fundamental responsibility for KML when using technology such as CCTV and CCTV recording systems.

This CCTV Systems Privacy Policy (Privacy Policy) outlines how KML collects, uses, stores and discloses personal information, including how you can access information, from KML's use of Closed-Circuit Television (CCTV) security cameras and electronic recording systems (known as CCTV Systems) in operation at its site.

This Policy may be reviewed and updated by KML. If we update this Privacy Policy, it will be published on our Website. We may also take additional steps to bring the changes to your attention, including by notifying you directly.

How we collect personal information: We may collect personal information via our CCTV Systems and other cameras installed at our sites, and KML will openly display signage advising that CCTV cameras are operating on site. We may also collect personal information about you from any person or entity sharing information with us for anti-social behaviour prevention and for law enforcement purposes.

The kind of personal information we collect: Personal information is information that identifies you or from which you may reasonably be identified. The types of personal information that KML may collect about you from its CCTV Systems include images and other biometric data from our CCTV System. We may also collect, use, store and disclose other forms of personal information outlined in our Privacy Policy.

Why we use CCTV Systems: KML operates a CCTV System to:

- actively deter crime against the Marina's people and property;
- mitigate the risk of criminal incidents, including Robbery, Theft or Assault against KML's owners, users, contractors, and members of the public attending the site.
- utilise technology and openly promote the security of the Marina's site to ensure the safety, well-being, and privacy of people, in or visiting the site, while creating a more secure working environment;
- capture factual evidence of crime, malpractice or incident involving harm to any person, loss or damage to any property, and to assist in any investigation; and
- support Operational Procedures, Health & Safety and Security programmes and support the execution of any process pursuant to NZ legislation lawfully utilised by the Marina's identification of trespassed individuals, identification of self-excluded persons.

Kinloch Marina does not use its CCTV System to:

- to monitor the general movement of team members or contractors while going about their normal duties/activities;
- to monitor buildings, premises, or occupants unrelated to the Marina's business purposes; or
- to gather information to intentionally intrude on the privacy of individuals.

How we use, and may share, your personal information:

The information gathered by The Trusts CCTV Systems pursuant to this Privacy Policy will be used for business purposes only and the purposes for which it was intended.

**The Marina's business purposes include:**

- operate CCTV Systems as a deterrent to 'would-be' offenders committing crime and to gather evidentiary material confirming criminal acts or events;
- gather information to:
 - assist investigations into crime, malpractice, customer actions, or incidents involving harm to any person and loss or damage to property; and
 - support any procedural or legislative process related to requisite policies or procedures;
- assist us in ensuring security, health and safety and customer protection at The Marina's site, and record information independently to provide necessary assurance to mitigate safety, security, and compliance risks;
- assist us, our service providers and any other persons or entities with whom we agree to share information relevant to monitoring anti-social behaviour and law enforcement purposes, in investigating and preventing any potential, suspected or actual breaches of law or anti-social behaviour;
- to comply with relevant laws and regulations;
- for any specific purpose which we notify you of at the time your personal information is collected; and
- for our administrative purposes.

We may disclose information about you:

- if we are requested to do so during legal proceedings or other investigations;
- with your authorisation;
- to law enforcement agencies, government agencies or other third parties, where required by law;
- to third parties where necessary to assist us in investigating and preventing any potential, suspected or actual breaches of law or anti-social behaviour; and
- to third parties with whom we agree to share information relevant to monitoring anti-social behaviour and for law enforcement purposes, in investigating and preventing any potential, suspected or actual breaches of law or anti-social behaviour.

CCTV System Information Security

KML will ensure that information collected through the CCTV Systems is protected by such security safeguards as are reasonable in the circumstances to protect against loss, misuse and unauthorised access, use, modification, or disclosure.

- access/password protected;
- secured in cabinets or a secure office; and
- under the management and control of a Site Manager.

How you can access/amend your personal information

If you wish to obtain confirmation that we hold personal information about you and to access that information, or you wish to request a correction to your personal information that we hold, please contact us at manager@kinlochmarina.co.nz.

If you request access to, or a copy of, your personal information, we will provide you with a copy of the personal information we keep about you. However, we reserve the right to charge you a reasonable amount for providing copies of any personal information you request, to take into account the time, cost and effort involved.

How long we hold personal information

We will determine how long we hold your personal information, except that we will not keep your personal information for longer than is necessary to achieve the purposes for which we may lawfully use it.

Who you can contact for further information: manager@kinlochmarina.co.nz