

## Introduction

This Privacy Policy explains how Avalon Airport Australia Pty Ltd ACN 069 136 652 and their related bodies corporate (**'we'/'us'/'our'/'Melbourne Avalon Airport'**) manages your personal information.

We are bound by the Australian Privacy Principles of the *Privacy Act 1988* (Cth) (**'Privacy Act'**) in our handling of personal information we collect about you. We may tell you more about how we handle your information at the time we collect it.

## What is personal information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable from the information or opinion. Examples include your name, gender, date of birth, address, telephone number or email address.

## Collecting your information

We may collect personal information about you when you contact us, visit Melbourne Avalon Airport or when you request or use one of our products or services (for example, the WiFi service or our online parking booking service). We may also collect personal information about you if we are required to do so by law, for example the *Civil Aviation Act 1988* (Cth) and the *Civil Aviation Regulations 1988* (Cth).

## What personal information do we collect?

The information we collect may include your name, age, gender and contact details (for example, your home or business address and email address) and location data whilst within Melbourne Avalon Airport.

If you visit the airport terminal, we may collect CCTV images of you from our closed circuit cameras. Our security personnel are equipped with audio-visual recording devices and may record your contact with them for quality, safety and security purposes. You will be notified orally and in writing before your contact is recorded.

If you login to the WiFi service we provide, we may collect any MAC address associated with your wireless device. We may also collect information about your interactions with us or the shops in the airport terminal.

If you do not provide some or all of the information we request, we may be unable to provide you with a product or service.

If we receive unsolicited personal information about you (that is information we have not requested), and we determine that we could not have lawfully collected that information, we will destroy or de-identify the information if it is reasonable or lawful to do so.

## Why do we collect your personal information?

We may collect your personal information if required by law, but generally we do so:

- to assess and process any request you make for services;

- to provide you with any service you request or assist you with any inquiry you make and to contact you in this regard, including by electronic messaging such as short message system (“SMS”) ‘texts’, by email, by mail, by phone or in any other lawful manner;
- to manage our relationship with you;
- to undertake internal processes including marketing, segmenting, customer profiling, information technology systems
- for development, training, statistical research, service improvement and corporate planning;
- to identify and (unless you tell us not to) tell you about products and services (including products and services of third parties) that we believe may interest you;
- to contact you in relation to a competition of Ours you may have entered; and
- for quality, safety security purposes where information is collected by our security personnel.

### **Disclosing your information**

We may disclose personal information about you with:

- our related bodies corporate, assignees, agents, contractors and external advisers;
- law enforcement, regulatory and government bodies (and other bodies, if required to do so by law);
- reward program providers and promoters of services we provide; and
- third parties who provide us with services.

When we disclose your information to third parties, we limit their use and disclosure of that personal information to the specific purpose for which it is disclosed and require them to protect your information in accordance with the Privacy Act.

We may disclose your personal information to our systems support service providers.

### **Security and storage**

We may hold your personal information in either electronic or hard copy form. If you provide information to us electronically, we retain this information in our computer systems and databases. If you provide information to us in hard copy (paper) this information is normally retained in our files and a copy is made to our electronic files.

We have appropriate measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way. You should be aware that there are risks with transmissions and storage of personal information via the internet. As a result, we cannot guarantee the absolute safety of the information we collect. However, we will always take reasonable steps to maintain the security of your personal information.

We employ secure methods to destroy or de-identify your personal information, which we will do when permitted or required by law, and where such information is no longer required by us.

### **Anonymity**

Where practicable you may be able to deal with us anonymously or by using a pseudonym, for example, when you visit our website or if you send us a query of general nature.

However, where you are purchasing our products or services (for example, by making a booking to use our car park), we will require certain personal information about you to facilitate your purchase.

### **Accessing and correcting your personal information**

We take all reasonable steps to ensure that the information we may collect, use or disclose is accurate, complete and up-to-date. You have rights to access your information and correct it if it is inaccurate, out-of-date or incomplete.

You may request access to the information we hold about you at any time by contacting our Administration Team via telephone on (03) 5227 9100 or via email at [enquiries@avalonairport.com.au](mailto:enquiries@avalonairport.com.au). Alternatively, you may post your complaint, question or concern to the following address:

Att: Administration  
Melbourne Avalon Airport  
Locked Bag 9  
Lara, Victoria, 3212

We will respond to your request within a reasonable time. There is no fee for making a request but we may charge you the reasonable costs of providing our response to a request for access to personal information.

If we refuse to give you access to any of your personal information, we will provide you with reasons for the refusal and the relevant provisions of the Privacy Act on which we rely to refuse access.

You may also ask us to correct any information we hold about you by contacting us using the details noted above. We will deal with your request to correct your information in a reasonable time. If we correct your information and it is information we have provided to others, we will notify them of the correction where we are required to do so by the Privacy Act.

If we do not agree with the corrections you have requested, we are not obliged to amend your information accordingly, however, we will give you a written notice which sets out the reasons for our refusal.

We will respond to your request to access or correct information within a reasonable time.

### **Website and WiFi**

You must read and understand the privacy policy, and by then clicking 'accept' on the initial landing page to access the WiFi service.

When you access our website or the WiFi service we provide, we may collect information such as the time and date of your access, your server address and your browser type. When you use the 'Contact Us' page on our website we may store any information you send us so we can respond to you if necessary.

We may place and access any cookies on your browser. We, our service providers or third parties may use cookies to understand your use of our website or our WiFi service, to deliver relevant survey opportunities or for advertising. The services we may use from time to time

include Google Analytics Advertising Features (Remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, Integrated services that require Google Analytics to collect data via advertising cookies and anonymous identifiers).

Our online services may contain links to other sites. We are not responsible for the privacy practices or policies of those sites and recommend that you review their privacy policies.

Complaints, questions and concerns.

Avalon is not in any way responsible for the collection, storage, disclosure or use of your personal information by any third party website that you access and/or use through the WiFi. You are solely responsible for checking the terms of use and privacy policy of each website you visit on a case by case basis and determining whether you accept such terms of use and privacy policies.

Avalon cannot guarantee the security or privacy of the WiFi and any information or communication to or from the WiFi by the User.

### **Complaints, questions and concerns**

If you have any complaints, questions or concerns about this Privacy Policy, the use of your personal information, or if you believe that in handling your personal information we have breached the Australian Privacy Principles, you may contact our Customer Service Team via telephone on (03) 5227 9100 or via email at [enquiries@avalonairport.com.au](mailto:enquiries@avalonairport.com.au). Alternatively, you may post your complaint, question or concern to the following address:

Att: Customer Service  
Melbourne Avalon Airport  
Locked Bag 9  
Lara, Victoria, 3212

Once we receive your complaint, we will respond to you as soon as possible and will let you know if we need any further information from you. We will notify you of our decision within 30 days, however if we are unable to do so, we will let you know the reason for the delay and the expected timeframe to resolve the complaint.

If you are not satisfied with our response to your complaint, or the way in which we have handled your complaint, you may contact the Office of the Australian Information Commissioner, whose contact details are as follows:

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

### **Changes to this Privacy Policy**

We may, update this Privacy Policy from time to time. We may notify you of any significant changes by posting a notification on our website. The current Privacy Policy will always be available here and you should refer back to this Privacy Policy to review any changes.

Last updated: December 2023