

Far North Holdings Limited Privacy Policy

We take Your privacy seriously and are committed to protecting Your personal information. This policy explains how we collect, use and share Your personal information, and how we keep it safe, in accordance with the Privacy Act 2020. In this policy, “we”, “our” and “us” means Far North Holdings Limited and our related companies.

By providing Your personal information or using our services, You agree to the terms of this policy.

We may update this policy to reflect changes to how we collect, store and manage Your information.

This policy statement is subject to, and should be read in conjunction with, any other terms and conditions You agree to when using or signing up to any of our services.

1 Collection of personal information

1.1 We collect different types of information that help us deliver supply and improve our services. These include, for example:

- (a) data collected from our website, Wi-Fi networks and online services, including the IP address, unique identifiers and settings of Your device, the operating system and browser Your device uses, Your browser's general Wi-Fi location, the date and time of Your session, the duration of Your session, the pages You view, actions You take when using our website or Wi-Fi networks and technical, diagnostic and performance related data; and
- (b) information collected through Your interactions with us or the use of any of our services, including:
 - (i) Your name and contact details (such as email address and phone number), date of birth, billing information and address;

- (ii) phone conversations with our staff, which may be recorded;
- (iii) Your email communications and Your written or verbal interactions with us;
- (iv) the number of visits You make to our premises;
- (v) registration numbers (e.g. for vehicles, aircraft or boats) that You provide to us, or which are recorded when You visit our offices or other premises; and
- (vi) images (via photograph or film) captured at any of our premises.

2 How we collect Your personal information

2.1 We collect information directly from You when You interact with us by, for example, accessing our website or by using one of our services.

2.2 We may also collect Your personal information:

- (a) as part of a recruitment processes where You apply for an employment or contract opportunity with us;
- (b) by recording calls You make to our staff;
- (c) through the recording of images on video or CCTV footage in and around our offices, airports, marinas, maritime facilities and other premises where we operate;
- (d) when You subscribe to receive any communications from us;
- (e) when You log into any of our Wi-Fi networks;
- (f) through the use of cookies, web beacons, web chat and usage monitoring software when You use our website; and

- (g) the motor vehicle registration database.
- 2.3 We may also collect Your personal information from third parties, such as:
- (a) where You have authorised this collection by us;
- (b) a publicly available source; or
- (c) a government department, body, or law enforcement agency.
- 2.4 We may also create new information about You by combining Your information with other data we have.
- 3 How we use Your personal information**
- 3.1 Data regarding Your usage of our websites, Wi-Fi networks and other online services is collected to help us improve and offer the services You need, and to improve our services generally. We may also use this data to improve our related products and services.
- 3.2 Data collected from Your general interactions with us may be used:
- (a) for safety and security purposes;
- (b) to respond to any queries or requests for information that You may have;
- (c) to process transactions and administer any account You have with us, including to bill You where applicable;
- (d) to help us develop, improve, manage, administer and facilitate our services and operations and those of our business partners;
- (e) for internal purposes (such as risk management, staff training and billing);
- (f) to ensure compliance with our other policies;
- (g) as part of the investigation and analysis of incidents by us or an authorised third party;
- (h) for us to notify You of services, opportunities, products or benefits which we are offering; and
- (i) to conduct research.
- 3.3 In addition to the foregoing, we may use Your personal information:
- (a) in connection with the original purpose for which it was collected, or for a directly related purpose;
- (b) with Your authorisation (including under this policy);
- (c) to protect against illegal and fraudulent activities (includes taking proactive measures to secure our networks);
- (d) to comply with our legal and regulatory obligations, including court orders and other legal processes, law enforcement assistance, emergency response assistance; and
- (e) if we have reasonable grounds to believe that sharing this content is necessary to prevent or lessen a threat to someone's life or health (including Your own) or for public safety.
- 4 How / why we share Your personal information**
- 4.1 We will only share Your personal information:
- (a) in connection with the original purpose for which it was collected;
- (b) for a directly related purpose;
- (c) with Your consent; or
- (d) for another lawful purpose.
- 4.2 We may disclose Your personal information to:
- (a) our staff, or advisors, where this is necessary for them to carry out their duties or to provide any of our services to You;

- (b) trusted third parties like service providers, business partners, agents, and advisors (although we require such recipients to take appropriate measures to protect the information and restrict their use of it); or
 - (c) where required by law, any government department, body, or law enforcement agency.
- 4.3 We usually only keep Your personal information for as long as it is needed in connection with its original purpose. After that, we delete or anonymise it.
- 4.4 Some personal information may be retained for longer periods of time for purposes directly connected to the original purpose, or to comply with our legal and regulatory obligations.
- 5 How we protect Your personal information**
- 5.1 We take all reasonable steps to protect Your personal information from misuse, loss and unauthorised access, modification or disclosure. We have a range of physical and technology policies in place to provide a robust security environment and ensure the ongoing adequacy of these measures by regularly reviewing them.
- 5.2 Communications over the internet, such as emails, are not secure unless they have been encrypted. We may allow third parties to monitor our network for security and information assurance purposes.
- 6 Accessing and correcting Your personal information**
- 6.1 We take all reasonable steps to ensure any personal information we hold is accurate, up to date, complete and relevant.
- 6.2 You can ask us for:
- (a) confirmation as to whether or not we hold personal information about You;
 - (b) access to Your personal information; and/or
- (c) a correction of the personal information we have about You,
- by contacting us at Email: enquiries@fnhl.co.nz Ph: (09) 402 5659. We will process any request You submit in accordance with our obligations under the Privacy Act 2020.
- 7 Making a privacy complaint**
- 7.1 If You have any concerns or complaints that Your privacy has been compromised in any way, please let contact us at Email: enquiries@fnhl.co.nz Ph: (09) 402 5659. We will do our best to ensure that Your concerns are addressed promptly.
- 7.2 If You are not satisfied with the outcome of Your complaint, You have the right to request the matter is investigated by the New Zealand Privacy Commissioner at any time during or after raising a complaint with us. [Visit the website of the New Zealand Privacy Commissioner](#) for more information.