

# Privacy Policy

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## Privacy Policy

In this Policy, 'we', 'us', or 'our' refers to the Colliers Real Estate Managed Property, 18 Willis St website.

We are committed to complying with applicable privacy laws and will protect your personal information in accordance with the privacy principles set out in the Privacy Act 2020. In this Policy, 'personal information' has the meaning defined in the Privacy Act 2020.

By providing your personal information or enabling collection of personal information through use of services or entry into competitions, you acknowledge the collection and use of such information by us and our agents, in accordance with this Policy.

This Policy is subject to and applicable in conjunction with the Terms and Conditions for this website and any other terms and conditions you agree to when using or signing up to any of our services or activities.

### 1 Collection of information

- 1.1 Personal information is collected, where applicable, for the purposes described in this Policy, including to inform of upcoming events, activities, promotions and ensure full enjoyment of the property by staff, retailers, contractors, sponsors and customers alike.
- 1.2 Where CCTV cameras are operational within the centre or on the property, recordings are the property of the centre and we retain all rights to record and store camera footage. This is to maintain safety and security of the property and its occupants. This footage may constitute personal information, and by entering our monitored sites you acknowledge the collection of any such footage.
- 1.3 We will only use personal information that we collect for the purposes for which it is collected, including as set out in this Policy.
- 1.4 Collection can be by way of (inclusive but not limited to):
  - 1.4.1 Website registration and the collection of personal information through the required fields through the online form.
  - 1.4.2 Social media, including if you interact with us or our website using a social media account (including Facebook, Twitter, or Google+) and your publicly accessible social media and networking posts.
  - 1.4.3 Use of mobile applications, URLs, and third-party applications within the centre including those that utilise the centre's infrastructure, including Bluetooth beacon networks and Wifi logins. This includes information from devices connected to or indefinable by centre infrastructure where we or third-party providers automatically collect key statistical data from your device across location, usage, type of device, movement around centre and consented data from signing in to access.



- 1.4.4 Centre competitions where your details are entered into the database as a competition entry requirement.
- 1.4.5 Services hire for mobility aids or other equipment from the centre for records of the hirer.
- 1.4.6 The purchase, redemption and online activity from centre gift cards.
- 1.4.7 Our retailers operating within the centre.
- 1.4.8 Carpark information, where the centre carpark is under video/camera surveillance. Personal information, car licence plate details and images may be collected directly or from third parties relating to the management and security of the premises and visitors to the property.
- 1.4.9 Website traffic and behaviour through use of the centre's website, including content accessed and services utilised, through use of log files or cookies.
- 1.5 Aggregated information is generated automatically by our online systems. This includes statistical tracking information used for analysis to enable us to analyse traffic, behaviour and patterns for the purpose of improving the centre's website. Such information is inclusive of, but not limited to the numbers of visitors and visits to the website, time, date, pages and navigation of visit, location based on IP address country of origin, systems users access the site and leads from other sites. It does not individually identify users and is used for statistical purposes only.
- 1.6 Collection and analysis of information collected can be used for marketing and communications to provide a better service, more desirable activations and promotions for visitors, statistical visitor information to owners, potential retailers and management teams.
- 1.7 If you provide us with personal information about someone else, you must make sure that you are authorised to disclose that personal information to us and that, without us taking any further steps, we may collect, use, store and disclose such personal information for the purposes described in this Policy. You must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that personal information is being collected, the intended recipients of that personal information, the individual's right to obtain access to that personal information, our identity, and how to contact us.

## **2 Use of information**

- 2.1 We use your personal information for the purposes of:
  - 2.1.1 Identifying visitor's use and patterns to understand service requirements, mapping journeys and best meeting needs.
  - 2.1.2 Verifying visitor's use of our website, to conduct address verification and to enrich your profile and search ability.
  - 2.1.3 Improving our website to provide information on the centre, its retailers or related companies, that may be of interest.



- 2.1.4 Communicating marketing, promotional and publicity activity including direct marketing and marketing research and remarketing and retargeting (including by using Google Analytics).
  - 2.1.5 Presenting advertising and information that is most relevant to you and your interests.
  - 2.1.6 Analysis in aggregate form (identifiable characteristics removed so that you will remain anonymous).
  - 2.1.7 Enforcing our contractual rights.
  - 2.1.8 Statistical and research purposes (on an anonymised basis).
  - 2.1.9 Complying with our financial, regulatory and other legal obligations.
  - 2.1.10 Purposes directly related or incidental to the above.
  - 2.1.11 Any other purpose which is stated to you at the time of collection, authorised by you or permitted by law.
- 2.2 In all circumstances we will take all reasonable steps to ensure that our use of your personal information is compliant with all applicable New Zealand law.

### **3 Sharing and Disclosure of Information**

- 3.1 We will disclose your personal information only in accordance with this Policy and the Privacy Act 2020. We may provide personal information to third parties where necessary or appropriate to facilitate the purpose for which such personal information was collected pursuant to the Policy. To the extent permitted by law, we may share your personal information to a third party relating to the management of the centre and/or security of the premises and visitors, staff, guests and contractors to the property. In the instance where we contract marketing activity to a third-party, they would be privy to personal information but bound through contract with 18 Willis St.
- 3.2 Personal information can be passed on to law enforcement and governing bodies, centre staff, subcontractors, third parties, insurers and retailers.
- 3.3 Personal information will only further be shared, should we:
- 3.3.1 Have your permission to do so by agreeing to the disclosure and used for the intended purposes you agreed to.
  - 3.3.2 Be responding to a request of information when you enquire about our services, you will be added to receive further information pertaining to this.
  - 3.3.3 Be required by our contractors, enabling them to provide their service so we can complete a transaction on your behalf.
  - 3.3.4 Receive a lawful request from any law enforcement agency including facilitating court proceedings or to protect our rights, the property or the safety of persons, public or government authorities, courts or regulatory agencies.
  - 3.3.5 Need to for safety, security and information assurance purposes.



3.3.6 Be required to do so for legal and auditing purposes.

3.3.7 Need to provide this personal information to our personnel, agents and delegates or related companies in order to perform the relevant services.

3.4 In all circumstances we will take all reasonable steps to ensure that where your personal information is disclosed to third parties they only use your personal information to the extent necessary to perform their function and that their use of your personal information is compliant with all applicable New Zealand legislation. However, we are not in any way responsible for the privacy policies of any third parties or the way in which they hold or use personal information.

#### **4 Storage and Retention of Information**

4.1 We store all personal information we collect in electronic form on secure servers. Original documentation will be destroyed.

4.2 We may store your personal information on servers and services both within New Zealand and offshore (including third party cloud-based services and storage).

4.3 We may access and use that personal information in and outside New Zealand. We only retain personal information for so long as it is necessary for the purposes for which the information can lawfully be used.

#### **5 Your Rights**

5.1 We will take all reasonable steps to ensure personal information we hold is accurate, however it is your responsibility to let us know if the personal information we hold about you needs to be corrected or updated.

5.2 Where the use of your personal information is based on consent you have previously given, you have the right to withdraw your consent at any time. You can unsubscribe from receiving any marketing communications and removing yourself from the active database at any time, by clicking 'unsubscribe' at the bottom of the relevant marketing email communications.

5.3 You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be updated or corrected if you think it is wrong. Following your request, we will consider if the personal information requires amendment. If we disagree, acting reasonably, that there are grounds for amendment, we will add a note to the personal information stating that you disagree with it.

5.4 You should contact us immediately if you believe we have breached your privacy or have any concerns so that we can investigate it. We have a formal procedure in place in relation to investigating and dealing with privacy breaches. We aim to ensure that all complaints are investigated and dealt with within a reasonable time and will notify you of the outcome of any investigation.

5.5 If there has been a breach, we will endeavour to determine the nature of the breach and how it occurred. In order to conduct the investigation, it may be necessary to contact you to obtain further information or clarification.



- 5.6 If a breach is found, we will comply with all requirements of the Privacy Act and the Privacy Commissioner, we will also review our processes and policies to prevent similar future breaches occurring.

## **6 Cookies**

- 6.1 Our website uses cookies (a short piece of data which is sent from a web server to a web browser on your machine when you visit our website). The cookie is stored on your machine but cannot do anything to your machine. A web server sends you a cookie and your browser accepts it. The browser then returns the cookie to the web server, recognising that you have visited the site before and coordinates your access on that website. If you visit our website again the cookie enables the server to recognise that you have visited before and helps co-ordinate your access to different pages on our website. We may use cookies to monitor use of the website and to serve you better when you return to it. We cannot trace your personal information as a result of using cookies.

## **7 Advertising and Third-Parties**

- 7.1 Should you leave our site, irrespective if you have clicked on any advertising from our website or email communications, our Policy no longer applies. You are then bound by the privacy policy of the subsequent site. It is in your best interest to review these. Advertisements managed or placed on our site by third party companies may request or record information from users, use cookies or non-personal information when clicking or activating their banner advertisements. This automated technology and statistical collection may not be obvious to you. We take no responsibility of any consequences arriving from such subsequent sites.
- 7.2 Where personal information is collected from you directly by a third party (including through a device installed at 18 Willis St) our Policy does not apply to their collection, use, storage, or disclosure of such personal information. Instead, the privacy policy of the relevant third party applies, and it is in your best interest to review their privacy policy.

## **8 Business Transactions**

- 8.1 If ownership or management of 18 Willis St, or of the website or any of its portions changes, your personal information may be transferred to the new owner or manager, so the website can continue operations with the then-current privacy policies still applicable, without requiring your further consent.

## **9 Changes in privacy policy**

- 9.1 We reserve the right to amend this Policy from time to time and alter functionality to take account of new laws and technology, changes of operations and practices, and the changing business environment. Any changes made will be updated in this Policy accordingly. We will inform you of any changes by way of publishing an updated policy on the website, effective from the date of publication.

## **10 Contact Details**

- 10.1 If you have any questions about our Policy or your personal information, please feel free to contact our Privacy Officer at [hello@18WillisSt.co.nz](mailto:hello@18WillisSt.co.nz)

## **11 Protection of your details**



- 11.1 While we make every effort to guard your privacy and secure the personal information we receive, however when you provide us with personal information, you do so at your own risk. Due to the nature of the Internet and email systems, we are unable to guarantee the privacy and confidentiality of your personal information while it is transmitted over the Internet.
- 11.2 Please take measures to protect your personal information by always closing your browser on completion of sessions and protect your personal information and emails especially when you use a public computer.
- 11.3 Please contact us immediately should you be concerned that someone has gained access to your personal information, or we have breached our privacy obligations or your privacy rights. We are happy to discuss any issues with you.