

# WSA Policy Privacy

14 February 2023

**Document Status:** For Use

**Document Type:** Policy

**Document No:** WSA00-WSA-00000-CP-POL-000011

**Revision No:** 01



### Change history.

Version Details	Document Owner:	Verified by:	Approved by:
<b>Revision: 00</b> <b>27/08/2018</b>	<b>Melanie Burnicle</b>   Company Secretary & Corporate Counsel	<b>Katie Newton-John</b>   General Counsel and Company Secretary	<b>WSA Board</b>
	<b>Main Changes:</b> Original Issue		
<b>Revision: 01</b> <b>14/02/2023</b>	<b>Steven Van Der Donk</b>   Chief Legal Officer	<b>Larissa Di Mauro</b>   Senior Legal Counsel	<b>WSA Board</b>
	<b>Main Changes:</b> Updated to incorporate general updates and introduce more specific provisions identifying the evolving and future anticipated circumstances in which WSA will collect, hold, and use personal information.		

### Related Documents

This policy should be read in conjunction with the related documents listed in the table below.

Document Number:	Document Description:
WSA00-WSA-00000-HR-POL-000001	Code of Conduct Policy
WSA00-WSA-00000-HR-POL-000002	Confidentiality Policy
WSA00-WSA-00000-CP-POL-000012	Employee Records Policy

© WSA Co Limited | ABN 81 618 989 272

Copyright (and other intellectual property rights, if any) in this document is owned by WSA Co Limited (**Western Sydney Airport**). Other than as permitted under the *Copyright Act 1968* (Cth), this document (in part or as a whole) cannot be reproduced, republished, communicated or adapted without the prior written consent of Western Sydney Airport.

All rights are reserved, including in relation to logos or trademarks.

For enquiries regarding the licence and any use of this publication/document, please contact: **Steven Van Der Donk** | **Chief Legal Officer**, WSA Co Limited, PO Box 397 Liverpool NSW 1871 | [svanderdonk@wsaco.com.au](mailto:svanderdonk@wsaco.com.au)

## Table of Contents

1.	Introduction.....	3
1.1.	To whom does this Policy apply? .....	3
1.2.	Policy review .....	3
1.3.	Policy availability .....	3
2.	Collection of Personal Information .....	3
3.	Digital Data Collection through our website .....	4
4.	Use and disclosure of Personal Information .....	5
5.	Direct marketing .....	6
6.	Customer panels and market research .....	6
7.	Disclosure to Overseas Recipients .....	7
8.	Personal information about employees.....	7
9.	De-identified or aggregated information.....	7
10.	Storage and Security.....	7
11.	Accessing and Correcting your Personal Information.....	8
12.	Complaints .....	9
13.	Third Party Practices .....	9

**WSA Co Ltd (WSA)** takes its privacy obligations seriously and is bound by the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs).

This Privacy Policy (Policy) outlines how WSA handles personal information.

This Privacy Policy uses the definition of personal information which is provided in the Privacy Act and captures any information about an identified or identifiable individual.

Generally, we collect, store and use personal information to carry out our business functions and activities, which include:

- developing and operating Western Sydney Airport;
- project management activities;
- managing recruitment and employment;
- stakeholder and customer engagement;
- marketing activities; and
- communicating with the public.

This Privacy Policy will be updated when our information handling practices change. Updates will be published on our website.

## 1. Introduction

### 1.1. To whom does this Policy apply?

This Policy applies to anyone who provides personal information to WSA, including members of the public, contractors, volunteers, board members, secondees, consultants and service providers.

This Policy also applies to individuals applying for employment at WSA and the collection of Sensitive Information about WSA employees as well as the use or disclosure of Personal Information about employees for purposes not directly related to the employment relationship. WSA employees should also refer to our **Employee Records Policy** which outlines the way that WSA handles 'Employee Records'.

### 1.2. Policy review

This Privacy Policy will be updated every 3 years or when our information handling practices change.

### 1.3. Policy availability

This policy is available to be accessed on the **WSA Published Documents SharePoint** site as well as **WSA Website**. Currency and accuracy cannot be guaranteed if sourced from other locations.

## 2. Collection of Personal Information

We collect personal information that we reasonably require for a particular function or activity of WSA.

The types of personal information which WSA collects will depend on the circumstances of its collection and the nature of your particular dealing with us. We may collect a range of personal information about you such as your name, date of birth, image, recordings of your image and/or voice, social media account ID, address, email, telephone and mobile phone numbers.

In some limited circumstances, we may also collect sensitive information about you, including relating to matters such as health, race, sexuality and religion. We will always request your express consent before we collect sensitive information, and you may choose whether you wish to share sensitive information with us (unless the collection is required by law or specifically permitted by law and required to fulfill policy and reporting obligations).

We may collect your personal information in a range of ways:

- when you use or make an enquiry through our website, as discussed further at section 3 below;
- when you visit any of our premises, attend events run by WSA or our partners or otherwise interact with our staff at public events;
- when administering and performing any contracts with service providers;
- when you contact us via telephone or email ;
- when you register or subscribe to receive “Your WSI Updates”, to participate in the “WSI Panel” activities, or to otherwise receive information from us;
- when corresponding with you (whether in writing, in person or electronically);
- while conducting market research activities including surveys; and
- when administering any of our services.

In some instances, we use external service providers to assist us in collecting personal information. For example, we may use third party service providers to:

- provide ticketing services for our events;
- assist us in operating our call centres;
- conduct market research on our behalf; or
- undertake recruitment activities,

and those service providers may collect personal information on our behalf.

There may be other circumstances in which we collect personal information about you from publicly available sources or other third parties, such as suppliers, contractors, our clients and business partners.

We will otherwise generally collect your personal information directly from you, unless it is unreasonable or impracticable to do so. We may also collect personal information from someone else with your consent, or if this is required or authorised by law.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services or respond to your queries.

### **3. Digital Data Collection through our website**

We collect information through our website ( [www.westernsydney.com.au](http://www.westernsydney.com.au) ) in a number of ways.

#### **Analytics**

We use Google Analytics to collect anonymised data about your interaction with our website, which is hosted by a third party. This data is collected for the purpose of improving our website. The types of data collected include your device's IP address, geographic location (country only), search terms and pages visited, and date and time of webpage access.

## **Cookies**

To improve your experience on our site, we may use cookies. Cookies are text files stored on your computer, and accessible only to the websites which create them. Our website uses session-based cookies to gather website usage data, for the purpose of improving our website.

Our website may from time to time use cookies for statistical analysis, to understand user behaviour, to administer the site, to tailor the information presented to a user based on their preferences, and to improve user experience. Any information gathered by our use of cookies is compiled on an aggregate, anonymous basis.

Most web browsers automatically accept cookies, however you may delete, or disable cookies via your web browser options.

If you do not wish to have cookies placed on your device, you can change your web browser settings to reject cookies.

## **Submission of information**

Our website may allow you to submit information to us, such as via contact forms, surveys, or other feedback mechanisms. We may collect any personal information you choose to submit to us via those forms.

## **Panel and updates subscription**

Contact details and information including (but not limited to) name, email address, address, position, organisation and interests are stored as part of subscribing to receive “Your WSI” updates and subscribing to participate in the “WSI Panel”.

## **4. Use and disclosure of Personal Information**

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We may use or disclose your personal information to:

- facilitate our communications and interactions with you, including (but not limited to) responding to your queries or complaints;
- contract with you;
- customise your interactions with us and the services we provide;
- record your interaction with our website;
- conduct stakeholder and community engagement activities;
- otherwise maintain our relationship with you;
- fulfil our reporting requirements to the Australian government;
- undertake recruitment and contracting;
- manage, develop and administer our business;
- investigate, manage, respond to or defend any claims made against or involving WSA; and
- comply with our legal obligations including but not limited to those under Australian law.

This may involve disclosing personal information to government and regulatory authorities, contractors, professional advisors and service providers who perform services for or on behalf of WSA.

We may also use or disclose your personal information for other purposes, including:

- for another primary purpose made known to you on collection of the information;
- for a related secondary purpose, where we believe that you would reasonably expect this to occur;
- for any other purpose, where you have provided your consent for us to do so; and
- where otherwise permitted under the APPs, such as in instances where required by an Australian law.

We may also disclose personal information internally between our related bodies corporate.

We value your privacy and will never sell your personal information to anyone.

## **5. Direct marketing**

Like most businesses, marketing is important to our continued success. We therefore like to stay in touch with customers and let them know about new developments and opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

We may also engage third parties to assist us with our direct marketing activities. Those third parties may have access to personal information in order to facilitate that direct marketing, but we will not permit them to use your personal information for purposes unrelated to WSA.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting us using the details below or by using the 'Unsubscribe' link contained in one of our messages or emails.

## **6. Customer panels and market research**

WSA may conduct customer panels and other market research in order to better understand the needs of potential customers for the Western Sydney Airport.

Should you elect to participate in these activities, then WSA may collect, hold, use and disclose your personal information (including any sensitive information collected with your express consent) for the purposes of:

- conducting research projects;
- direct marketing related to the project or the Airport more generally (unless you have opted-out of direct marketing), including direct marketing tailored at using the specific personal information which you have provided to us (including sensitive information, where you have provided your consent for us to do so);
- development and operation of the Airport;
- customising and personalising your use of the Airport and other services offered by or on behalf of WSA;
- stakeholder and customer engagement; and
- other purposes as contemplated in section 4 above.

## **7. Disclosure to Overseas Recipients**

Web traffic information is disclosed to Google Analytics when you visit our website and is stored by Google across a number of countries.

While your personal information is generally stored on our servers located in Australia, it may also be stored on our partners', contractors' and suppliers' systems in other countries such as New Zealand, Canada, Singapore or the United States of America. We expect such parties to comply with Australian privacy law.

In some circumstances, we may ask for your consent to disclose your personal information to recipients located outside of Australia. In those circumstances APP 8.1 will not apply, and the foreign recipient of that data may not be bound by the *Privacy Act*.

Otherwise, we will generally only disclose personal information to an overseas entity if we are required or authorised by law to do so.

## **8. Personal information about employees**

We collect information in relation to employees as part of their application for, and during the course of, their employment, either from them or in some cases from third parties such as recruitment agencies.

Under the *Privacy Act*, personal information about a current or former employee may be held, used or disclosed in any way that is directly connected to the employment relationship. We handle employee information in accordance with legal requirements and our Employee Records Policy, as updated from time to time.

## **9. De-identified or aggregated information**

WSA may collect, use, hold and disclose de-identified or aggregated personal information for any purpose. The *Privacy Act* and APPs will not apply to this information, as it does not constitute personal information.

## **10. Storage and Security**

We take reasonable steps to protect the security of the personal information we hold, including by:

- taking steps to secure any records of personal information, whether stored physically or electronically;
- maintaining appropriate physical, procedural and technical security for our offices and information storage facilities;
- limiting access to personal information to those persons who need access to the personal information to do their job;
- facilitating personal information training sessions and ensuring that those persons with access to personal information have undertaken such training;
- regularly assessing risks relating to misuse, interference, loss and unauthorised access, modification or disclosure of information;
- maintaining audit trails of access, modification and deletion of electronic records of information; and
- undertaking regular privacy and data security audits.



If we become aware that a third party has accessed or used your personal information without authorisation, and such access or use is likely to place you at risk of serious harm, we will use reasonable efforts to contact you promptly and to notify the Office of the Australian Privacy Commissioner.

We will hold your information for as long as is required by our business operations and relevant laws, including under the Archives Act 1983. Where we hold personal information about you which is no longer needed for any valid purpose under the APPs, and we are no longer required to hold that information by any law, we will destroy or de-identify it.

## **11. Accessing and Correcting your Personal Information**

We will take reasonable steps to ensure the personal information we collect, hold and disclose is correct and complete.

You may contact us at any time to request access to your personal information held by us. You can also request us to correct any personal information that you believe is inaccurate, out of date or incomplete.

You may make an access or correction request by writing to WSA at the following address:

**WSA Co Ltd**  
**Attention: Privacy Officer PO Box 397**  
**LIVERPOOL NSW 1871**

or you can email our Privacy Officer at [privacy@wsaco.com.au](mailto:privacy@wsaco.com.au) and indicate that your query relates to a privacy request.

We will respond to all requests for access to or correction of personal information within a reasonable time.

There is no charge for lodging a request for access to or correction of your information. We may impose a small charge for our time involved in providing access and associated costs such as photocopying.

An access or correction request may be refused in certain circumstances under the Privacy Act. We will notify you and provide reasons for any refusal decision.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

If you request access to your personal information in a particular way, we will endeavour to facilitate access in the manner requested if it is reasonable and practicable for us to do so.

## 12. Complaints

You may make a complaint to us if you believe we have breached our privacy obligations, or otherwise have concerns or queries in relation to our handling of your personal information.

To make a complaint or enquiry, please write to WSA at the following address:

**WSA Co Ltd**  
**Attention: Privacy Officer PO Box 397**  
**LIVERPOOL NSW 1871**

Or you can email us at [privacy@wsaco.com.au](mailto:privacy@wsaco.com.au) and indicate that your query relates to a privacy complaint.

On receiving your complaint, we will conduct an investigation within a reasonable time and in any event within 30 calendar days of receipt of your complaint. We will deal with your complaint confidentially, and we may ask you for further details to assist us with the investigation. You will be notified of the investigation outcome.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

**Office of the Australian Information Commissioner**

**GPO Box 5288**

**Sydney NSW 2001**

**Telephone: 1300 363 992**

**Online enquiries: Enquiry form**

## 13. Third Party Practices

This Privacy Policy does not address, and we are not responsible for, the privacy, information or practices of any third parties, including but not limited to any third party operating any website to which we provide a link on our website or which we use to communicate content (for example, LinkedIn, Qualtrics, Facebook, Google, Instagram and YouTube). Such third-party sites have their own privacy policies, and we are not responsible for the collection, storage, security, usage and disclosure policies and practices of other organisations.