

Mana by Transdev Privacy Statement

Mana by Transdev (Mana) is responsible for managing customer, employee and third-party information to ensure compliance with the *Privacy Act 2020*.

Mana is committed to ensuring that privacy of Personal Information is protected and strives to uphold the best practice privacy standards in the collection, storage and use of Personal Information.

For the purposes of this Privacy Statement, "us", "our" and "we" means Mana Newlands of 44 Newlands Road and our related entities (including but not limited to the Transdev Group Entities). "You" means anyone who uses our Services (including provision of passenger transport services, advertising services, websites, applications, competitions, enquiries and complaints and customer surveys) or visits our websites. By using our Services, you agree to the terms and conditions of this Statement.

What Personal Information do we collect?

We may collect a variety of Personal Information about you, depending on the circumstances of our dealings with you, the type of Service you may request and the payment methods chosen for the Services. We will only collect Personal Information as necessary to provide the Services.

Personal Information we may collect and hold will commonly include:

- (i) your first and last name;
- (ii) date of birth;
- (iii) Addresses;
- (iv) email address;
- (v) telephone numbers;
- (vi) family contact; and
- (vii) Credit card or other payment details;
- (viii) any special requirements you notify to us with respect to the use of our Services (which may include information such as comments, likes, tweets, status comments, profile information and complaint details); and
- (ix) if you are an employee, other employment related information.

By providing this information to us, unless you indicate otherwise, we will assume that you have given your consent to the collection of such Personal Information.

How we may collect Personal Information?

Information is collected and held so that Mana can operate a safe and effective passenger bus service, comply with legislation and regulations as well as employ and manage its staff appropriately.

We may collect Personal Information in the provision of Services to you and when you deal with us in person, on the telephone, through our websites or by other correspondence, including by letter, fax or email. In addition, we may obtain Personal Information from your participation in competitions and customer surveys relating to the Services.

CCTV

A camera surveillance system using Close Circuit Television (CCTV), records both sound audio and video footage on Mana's vehicles which includes Ministry of Education (MOE) services. On Metlink vehicles which include the Airport Express and the On-Demand Trial which are operated on behalf of Greater Wellington Regional Council (GWRC) sound recording is only within the driver cab area of the bus.

Signage on and inside these buses indicates where camera surveillance is operating. If you do not wish to be recorded, then you may choose not to use the bus service otherwise, you will be deemed to have accepted to have your audio and image recorded.

Use, Retention and Disclosure of Personal Information

Use of Personal Information

We use the Personal Information we collect from and about you to provide the Services to you which includes providing transport services, to measure and improve those Services, to improve your customer experience with our transport Services, to allow you to comment on the Services, to participate in competitions or rewards programs, to provide you with customer support, and to respond to inquiries. We may also use your Personal Information to improve the Services including through research and data analysis by us and our service providers.

CCTV footage and audio recordings are used:

- (i) to monitor traffic and passenger movements on the buses;
- (ii) as security in our depot facilities;
- (iii) to help investigate incidents; and
- (iv) to promote community and driver safety.

Disclosure of Personal Information

We may disclose your Personal Information with third parties, for example GWRC, on whose behalf we provide the Services, to our contractors to whom we contract out certain services, other transport carriers, travel service providers, data processing companies for the purpose for which the information was collected or for related purposes, for example, to complete a payment transaction on your behalf or provide you with a Service that you requested.

Your information may be shared between related entities where necessary to fulfil our business purposes (and other purposes specified in this Statement). This may include the provision of your Personal Information to our related entities overseas (specifically Australia and France) where considered by us as necessary to perform the Services.

In the event of unlawful activity being recorded, we may hand that CCTV data of the incident

over to Police for the purpose of an investigation. Likewise, if Police believe some unlawful activity was carried out then they may view, or ask us to hand over, any CCTV data that may assist in their investigation.

As a part of our contractual requirements, we may share any audio recording or CCTV footage with GWRC and MOE to enable them to:

- Investigate incidents;
- Ensure ticket revenue is appropriately collected; and
- Audit compliance with our contracts.

We will not share CCTV data with any other party, unless required to do so for law enforcement purposes.

Storage of Personal Information

Your Personal Information will be stored by us in accordance with our privacy procedures and may be stored electronically or in paper copy on computer servers or on files under our control or with third party data storage providers. By way of example, Personal Information provided in the course of lodging a complaint regarding the Services may be included in software hosted by third party service providers under contract to us.

We will take reasonable administrative, technical and procedural steps to protect your Personal Information from misuse, interference and loss, or from unauthorised access, modification or disclosure. When your Personal Information is no longer required for any of the purposes detailed in this Statement, we will take reasonable steps to destroy the information or to ensure the information is de-identified.

Access to CCTV/audio footage

Where a recording captures an issue relating to a particular employee which needs to be discussed with that employee, the employee in question and their representative / support person shall be entitled to view the recording.

If a passenger and/or member of public make a request to view CCTV footage of themselves, the request will be assessed in relation to the ability to readily retrieve the CCTV footage and whether the privacy of other identifiable individuals can be maintained.

Similarly, where a passenger has raised an issue and the passenger is recorded on CCTV regarding the issue or incident, the passenger may be entitled to view the recording relating to that passenger. The passenger, however, will be required to pay a fee to blur the image and sound of any other passengers that may appear on the footage to protect the identity of others. However, in any regard prior authorisation will be required by the Privacy Officer in relation to whether release of the footage is allowed and whether the identity of others in the footage is protected.

No attempt is made to identify individuals from sound and video footage except in relation to a reported or suspected incident requiring investigation.

Access to and correcting your Information

In line with the NZ Privacy Principles, you have the right to:

- find out from us whether we hold Personal Information about you;
- access that information; and, if applicable
- request correction of that information

Unless required by law or otherwise necessary as provided in the *Privacy Act* or this Statement, Mana Coach Services will not pass on Personal Information of any employees without the employees written authority.

If you want to:

- (i) find out what Personal Information that we hold about you; or
- (ii) make a request for sound audio and/or CCTV footage; or
- (iii) find out whether as an employee of Mana your privacy under the Privacy Act and/or this Statement has been breached; or
- (iv) make a complaint as an employee who is not satisfied with how a matter concerning the privacy of their information has been handled by Mana; or
- (v) raise any other queries with respect to Privacy or this Privacy Statement,

You may direct your query by contacting us at info@manacoach.co.nz and we will endeavor to provide you with a response as soon as reasonably practicable, but within 10 business days.

How to make a complaint

If you would like to make a complaint about the collection or use of your information, please contact us at the details below. We will provide a response as soon as reasonably practicable, but within 30 days.

If you are not satisfied with our response to your complaint, or at any time during the process, you may refer your complaint to the Office of the Privacy Commissioner (www.privacy.org.nz).