

## Attachment 4: AT Customer Privacy Policy

# Customer Privacy Policy

Auckland Transport is committed to protecting our customers' personal information. We have created this Customer Privacy Policy to help you understand how we collect, use and protect your personal information when you visit our websites, contact us or use our products and services.

This policy is provided for your information and doesn't limit or exclude your rights under the [Privacy Act 2020](#).

### 1. What personal information does Auckland Transport collect?

We collect information about you that you have provided to us (through registration, completing forms, contacting us, or using our products and services) or that we may have obtained from another source (such as our suppliers, transport operators or from marketing organisations).

This information may include your name, date of birth, address, **email address**, telephone numbers, information on how you use our products and services (such as your transaction history, how much you spend, and browsing activity when visiting one of our websites), lifestyle information and any other information collected in relation to your use of our products and services.

When you visit one of our websites, Auckland Transport's Internet Service Provider may make a record of your visit and log the following information for statistical purposes:

- Your server address
- Your top level domain name (for example .com, .gov, .au, .uk etc)
- The date and time of your visit to the site
- The pages you accessed and the documents downloaded
- The previous site you have visited
- The type of browser you are using

This information about your use is **anonymised** and only analysed on a bulk basis for broad demographic content. Individual use is not analysed.

If you use one of our websites to complete an online application form, or create an account or register a card, we will only collect the information you provide as part of that process if you complete and submit the application or registration to us. If you log out of our websites or cancel your application or registration before submitting it, the information you had entered will be automatically deleted.

## 2. How does Auckland Transport use my information?

The information that we collect from and about you may be used by us for a number of purposes connected with our business such as:

2.1 processing your application for registration for use of Auckland Transport services or to access information on our websites made available only to registered users;

2.2 providing you with products and/or services you have requested or administering your account;

2.3 settling accounts with those who provide related services to us;

2.4 dealing with your requests, enquiries or complaints and other customer care related activities;

2.5 carrying out market and product analysis and marketing our products and services generally;

2.6 registering your details and allocating or offering you rewards, discounts or other benefits and fulfilling any requests or requirements you may have in respect of our loyalty or reward programmes and other similar schemes;

2.7 carrying out any activity in connection with a legal, governmental or regulatory requirement on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution;

2.8 carrying out activities connected with the running of our business such as personnel training, quality control, network monitoring, testing and maintenance of computer and other systems and in connection with the transfer of any part of our business in respect of which you are a customer or a potential customer;

2.9 for general administrative and business purposes;

2.10 so we can inform you about news, promotions or events.

## 3. Will Auckland Transport share my information?

There may be times when we disclose your personal information to third parties. If we do this, we will only disclose your information to:

3.1 those who provide products or services to us, or products or services that support the services that we provide, such as our Business Partners, other suppliers and transport operators;

3.2 anyone who assists us in protecting the operation of Auckland Transport, and our networks and central solution systems, including the use of monitoring and detection in order to identify potential threats, such as hacking and virus dissemination and other security vulnerabilities;

3.3 anyone who hosts or maintains data centres, service platforms and other infrastructure and systems on behalf of us and our group companies, where your information is processed;

3.4 persons to whom we may be required to pass your information by reason of legal, governmental or regulatory authority including law enforcement agencies and emergency services;

3.5 any person or organisation as authorised by the [Privacy Act 2020](#).

## 4. What about cookies?

"Cookies" are pieces of information that a website transfers to an individual's device's hard drive for record-keeping purposes. The cookie assigns that device an ID that allows Auckland Transport to recognise it when it is used to access an Auckland Transport website.

For more information on the types of cookies we collect and how we use them, please refer to our [Cookies Policy](#).

## 5. Will my personal information be protected?

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from unauthorised access, use, modification or disclosure.

## 6. How is my information retained and stored?

We may retain all personal information that we collect (on both our active systems and our archive systems), for as long as is necessary for us to carry out the purposes for which the information was collected (including for the purpose of providing services to you). For registration and account information, this means that the information is likely to be retained for the period of time that we consider your account (registered card or online account) to be active.

The Public Records Act 2005 requires us to retain "protected records" indefinitely. In some circumstances, your personal information may be included within a protected record.

The location at which we store your personal information will depend on the nature and purpose of the information and the manner in which you supply it to us. We may use, process, and store your personal information at our premises and/or storage facilities (whether in New Zealand or overseas).

## 7. Personal information and your rights.

You own your personal information. You have the right to know what information we hold about you, to request a copy and to request that we correct your information if inaccurate. Your rights of access to and correction of any personal information we hold about you are subject to the procedures set out in the Privacy Act.

If you would like to contact us about how we collect and manage personal information, ask whether we hold information about you, ask for access to copies of information we hold about you, or ask for correction to information we hold about you, you can contact us by:

- email to [privacyofficer@at.govt.nz](mailto:privacyofficer@at.govt.nz) or
- phone on [09 355 3553](tel:093553553) or
- post to:

Customer Liaison Team  
Auckland Transport  
Private Bag 92250  
Auckland 1142

When contacting us, please quote your name and address. We would be grateful if you could also provide brief details of what information you want a copy of (this helps us to more readily locate your information).

## 8. Changes to our Customer Privacy Policy

We may change this Customer Privacy Policy from time to time.

## 9. Acceptance

The Customer Privacy Policy forms a part of our [Website, Mobile App & Digital terms of use](#) and should be read in conjunction with them. By viewing and using our websites or related services offered in conjunction with our websites, you agree to Auckland Transport collecting and using your personal information as set out in this Customer Privacy Policy. If you do not agree to anything in this Customer Privacy Policy or if you do not wish to receive marketing material from Auckland Transport, you can either [contact us](#) or you can stop accessing or using our websites.

If you decide not to provide the personal information requested when you use, register or open an account on our website, this may result in services or products (including related services offered in conjunction with our websites) not being offered or provided to you.

# Cookies

## What are cookies?

"Cookies" are pieces of information that a website transfers to an individual's device's hard drive for record-keeping purposes. The cookie assigns that device an ID that allows Auckland Transport to recognise it when it is used to access an Auckland Transport website.

We use cookies on Auckland Transport websites to collect standard internet log information and details of our visitors' behaviour patterns in order to obtain statistics of the number of visits and the popular parts of those websites. These statistics are gathered and used **solely** for the purposes of **advertising**, and analysing, evaluating, and improving the content of Auckland Transport's websites.

**These cookies include:**

**Essential cookies:** Some cookies are necessary for the core functionality of sites. Our websites cannot function properly without these.

**Analytical cookies:** These help us study user behaviour, mostly to see if site users can find what they are looking for and can act on it. They allow us to recognise and count the number of visitors and see how they move around our website.

**Advertising cookies:** These cookies may be used to collect information to develop campaigns and target audiences for more personalised communications.

When you are logged into your Facebook or Google accounts while visiting our website, Facebook or Google may receive your information or activity on our website. More information about your Facebook Ad preferences can be found [on their website](#), and more information about Google Analytics' privacy practices can be found at Google's [privacy policy](#) and [terms of use](#).

## How we use cookies

### **Advertising, and** analysing website and app usage

We use **Google Analytics, Google Tag Manager, Google Floodlight, Google Firebase, and Siteimprove** to analyse how customers use our website and apps. This information helps us meet your

needs and identify improvements to our digital services, content, and user experience. This data is also shared with other Google services (such as its search engine) where it may be used to personalise advertising to match your online profile.

**Google Tag Manager** is used to manage [tags](#) (snippet of JavaScript that sends information to a third party, such as Google) on our site and apps.

Tags we use are:

- Google Analytics.
- Google Floodlight
- Google Firebase (currently only used in our AT Mobile app).
- Siteimprove

Google Tag Manager does not set cookies. See [Google Tag Manager Terms of Service](#) and [Google privacy policy](#) for more information.

**Google Analytics** stores information about:

- The pages you visit.
- How long you spend on each page.
- How you got to the site.
- What you click on while you're visiting the site.

Google Analytics sets the following cookies:

#### Google Analytics

NAME	PURPOSE	EXPIRES
_ga	Unique identifier so we can distinguish and count unique visitors to the site	2 years
_gat	Used to manage the rate at which page view requests are made	10 minutes

- [Find out how to opt out of Google Analytics cookies.](#)
- [Read Google's privacy policy](#)

#### Google Floodlight

Floodlight is a tracking system for tags that can measure the effectiveness of advertising and marketing campaigns. We use it to track activity on our webpages to see what a user is doing when they visit our site.

We use **Google Firebase** in our AT Mobile and AT Metro apps. Google Firebase is a collection of tools that help app owners add core features such as analytics, notifications, and crash reporting to their iOS and Android apps. The features we use are:

- Analytics – analyse user behaviour and demographics, so that we can improve content and user experience. The type of information collected, includes:

- The number of users and sessions.
  - Session duration.
  - Operating system.
  - Device model.
  - Geography.
  - First launch.
  - App open.
  - App update.
- Remote config – push out minor app updates without users having to download a new version.
  - Crash reporting – monitors our app for errors.
  - Notifications – send notifications to app users.
  - Dynamic links – create universal links that work across web, iOS and Android.

Google Firebase uses cookies, anonymous identifiers for mobile devices (eg Android Advertising Identifier or Advertising Identifier for iOS) or similar technology to collect data. Find out more about [how Google uses data when you use their partners' sites or apps](#).

You can opt out of advertisement tracking on iOS and Android in your device settings. Notifications can be turned off in the AT Metro app settings. We currently do not have an option for users to disable Firebase analytics or crash reporting. ~~Please think about any privacy implications before downloading and/or using our mobile app.~~

We do not collect or store your personal information (e.g. your name or address), so this information can't be used to identify who you are. We don't allow Google to use or share our analytics data.

## Remembering preferences and selections

Some cookies store your selections and settings so when you return to the site, we can present you with information customised to fit your needs.