



HAMILTON

INTERNATIONAL AIRPORT

Privacy Policy

2020

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Privacy Policy

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1. OVERVIEW

Hamilton International Airport is committed to protecting the privacy of individuals. In order to provide you with a safe, secure and innovative customer experience, we sometimes need to collect, use and disclose your personal information.

What does this Policy do? It describes how and why Hamilton International collects and uses our visitors' personal information and what we do with that information.

Who does this Policy apply to? Anyone who uses Hamilton International's services or facilities, including our website (www.flyhamilton.ca), as well as visitors to Hamilton International, such as passengers, customers, Airport employees, contractors, subcontractors or vendors. From time to time, Hamilton International Airport will disclose personal information to third parties in accordance with this privacy statement or as permitted or required by applicable law.

2. WHAT IS "PERSONAL INFORMATION"?

"Personal information" is any information about an identifiable individual. Examples include:

- Name, date of birth and contact information
- Identification numbers (e.g. passport info)
- Financial information (e.g. credit card number, bank account details)
- Health information (e.g. accommodation needs)
- Video surveillance images

3. WHY DO WE NEED YOUR PERSONAL INFORMATION?

You likely disclose personal information in your everyday life, whether it's paying for parking with a credit card or providing your email address to subscribe to online newsletters. The same goes for your experiences at Hamilton International. During your various interactions with us, we collect your personal information to ensure your safety and security during your time at Hamilton International and to provide you with a an innovative customer experience. Common examples where personal information may be collected include:

- Development, improvement and delivery of services
- Monitoring safety and security of airport operations

- Processing payment for the use of our services and facilities
- Compliance with legal and regulatory requirements
- Understanding and responding to customer comments and legal matters
- Identification and direct marketing purposes

If we need to collect your personal information, we endeavour to only collect the information required for that specific purpose. Where possible, we will notify you at the time of collection, tell you why we need it and what we plan to use it for.

4. HOW DO WE OBTAIN YOUR CONSENT?

When you provide Hamilton International with your personal information, you consent to us using it as set out in this Policy, and as may be further explained at the time of collection. Sometimes you will be asked to give your express consent, such as checking a box to indicate your consent. Other times, your consent may be implied when we can reasonably conclude that you have given consent by your actions. For instance, when you use Hamilton International services or facilities, we view your use as implying your consent for us to collect, use, and disclose your personal information for the purposes set out in this Policy.

If you provide us with another person's personal information, we assume that you have already obtained that person's consent to our collecting, using and disclosing their personal information in accordance with this Policy.

You may refuse or withdraw consent at any time on reasonable notice to Hamilton International except where prohibited by law or contract. Please note that if you refuse or withdraw your consent, we may be prevented from providing you with certain services or facility access that require your consent.

If you would like to refuse or withdraw your consent, please contact info@flyhamilton.ca. We will explain your options so you can make an informed decision.

5. VIDEO SURVEILLANCE

What is "Video Surveillance"? Capturing images or videos by closed-circuit television systems (CCTV) which record and store information about the movements of people in and around Hamilton International.

Since we cannot be everywhere at all times, we ensure the safe and efficient operation of Hamilton International by using 24-hour video surveillance throughout the Airport and the surrounding area. We maintain, collect and use video surveillance to:

- Monitor the safety and security of people and ensure compliance with regulatory requirements

- Protect Hamilton International property and the property of our employees, passengers, contractors, business partners and visitors to Hamilton International
- Monitor airport operations and improve Hamilton International services and facilities

Can I refuse to consent to video surveillance? If you visit Hamilton International, you cannot refuse to consent to video surveillance. Hamilton International is under video surveillance at all times for security and other purposes. When you visit any of our premises, including our parking lots and outside areas, you will be recorded and any video surveillance data may be collected, used and disclosed in accordance with this Policy.

What does Hamilton International do with recorded video surveillance? We treat your right to privacy very seriously and only use or disclose video surveillance to ensure safe and secure operations at Hamilton International, where we are required by law, or with the consent of the individual who has been recorded.

We take steps to ensure that video surveillance is protected against risks like loss, theft, unauthorized access, disclosure, copying, use, modification, or premature destruction. We do this with various safeguards, including physical, administrative, and electronic security measures.

Video surveillance footage is stored in a secure location that can only be accessed by authorized personnel, or with the consent of our Privacy Officer. Any unauthorized access to video surveillance footage must be reported to info@flyhamilton.ca.

6. FACIAL BIOMETRICS

Currently the Airport is completing a pilot project by capturing and processing facial biometrics. Facial biometrics are made by capturing images of your face and taking measurements to create a numeric template that is unique only to you. This template is used to measure your journey as you progress through the Airport and ensure that Queue are being managed appropriately and efficiently. Hamilton International does not collect any other personal information in support of this processing tool and therefore will not utilize the collected image data beyond the purpose with which it was collected. The facial biometric will be deleted 65 minutes after creation. Once the biometric data is deleted only the anonymous journey transaction data (entry and exit location and time stamps) are retained for 30 days for reporting purposes. It is a stand-alone system used only to measure and better understand a passenger's journey through the Airport, and cannot be used to prove the personal identity of any passengers.

7. WHAT INFORMATION DO WE COLLECT FROM OUR WEBSITE?

When you visit our website flyhamilton.ca we automatically collect information that does not identify you personally, but tells us other things about you: your location, preferences, electronic device, as well as details from your visit to our website, like the type of web browser you use and the content you accessed or downloaded.

Hamilton International uses this non-personal information for system administration purposes such as analyzing trends, administering our website, tracking user movements, and gathering demographic information for internal use, like statistical analysis, website improvement and improving user experience. We may disclose this type of non-personal information to third parties, like our consultants, and we may permanently archive it for future use. If this non-personal information is combined with your personal information, then we treat it all as personal information.

What are “cookies” and does Hamilton International use them? Cookies are data files sent to your browser and stored on your hard-drive when you visit certain websites. Cookies help to enhance your experience by customizing content based on your activities on a website. We use “per session” cookies to track your usage on our website during your current visit only and the cookies are deleted once you exit the site.

Hamilton International Airport is interested in any comments, concerns or general thoughts you may have in regards to its services. Our goal is to generate an open discussion that is constructive, informative, engaging and is centered around the airport. We will never censor comments based on political or ideological point of view; however, comments that are abusive, off-topic, use excessive foul language, or include hominem attacks will not be posted.

8. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

Third parties are individuals or organizations other than Hamilton International and yourself. This includes, but not limited to, government agencies and security contractors. Sometimes, we need to disclose your personal information to third parties for regulatory requirements, to facilitate services or ensure the security of our property.

When we disclose personal information to a third party, Hamilton International will make reasonable efforts to ensure that the third party has appropriate security procedures in place to protect the personal information it receives.

9. HOW WE STORE YOUR PERSONAL INFORMATION

We endeavor to retain your personal information for as long as it is needed for the purposes it was collected. Personal information used to make a decision that directly affects an individual, including whether to hire the individual as an employee, will be retained in accordance with the Airport's Data Retention and Destruction Policy.

We store and process your personal information in secured locations. If we use third party service providers (for example, web hosting providers and/or payment processors) or disclose your information to third parties, we take all reasonable steps to ensure that the third party uses your personal information in accordance with this Policy and has safeguards in place for the secure storage of your personal information.

Please note that your personal information may be transferred outside of Canada as a result of compliance with laws or use of third party servers. Once outside of Canada, it becomes subject to the laws of the foreign jurisdiction, which laws may or may not be different from Canadian laws.

We know how important it is to keep your personal information secure. We use physical, administrative and technological measures to protect personal information in accordance with the sensitivity of the information. Safeguards include locked file cabinets, secure servers and limiting access to only those individuals required.

10. HOW TO ACCESS YOUR PERSONAL INFORMATION

All visitors have the right to access their personal information from Hamilton International, including:

- identification of personal information under our control
- information about how we have used or may use personal information
- the names of anyone to whom your personal information has been disclosed

With respect to video surveillance, we reserve the right to refuse disclosure requests if doing so will compromise Airport security or breach the privacy rights of other individuals.

In addition to the reasons listed above, we reserve the right to require that video surveillance be viewed in the presence of Hamilton International staff and that no copies are provided. Depending on the circumstances, we may also require that anyone receiving a copy of video surveillance sign a non-disclosure agreement or other contract that limits what may be done with respect to the footage.

In certain exceptional situations, we may not be able to provide access to certain personal information that we hold about a visitor, and we will notify the requesting visitor of the reasons for the refusal.

Please make written requests to John C. Munro Hamilton International Airport, 9300 Airport Road, Suite 2206 Mount Hope, Ontario L0R 1W0

11. QUESTIONS?

We are always working to improve the ways in which we protect the personal information we receive, which means that this Policy may change from time to time. Please refer to the current version of Hamilton International's Privacy Policy posted on www.flyhamilton.ca.

If you have general questions or concerns regarding Hamilton International visitors' privacy or this Policy, please contact:

- John C. Munro Hamilton International Airport, 9300 Airport Road, Suite 2206 Mount Hope, Ontario L0R 1W0
- info@flyhamilton.ca
- 905.679.1999

We will investigate any complaints received in writing and will take appropriate measures to resolve complaints, where justified. Complainants will be informed, in writing, of the outcome of the investigation regarding their complaints.