



Facial Recognition
Technology Trial -
Privacy Impact Assessment
Report

February 2024

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1. Scope of the Privacy Impact Assessment

1.1 Project Summary

Foodstuffs North Island Limited (**FSNI**) is the franchisor of 328 supermarket stores¹ in the North Island of Aotearoa (**Stores**). Following a significant increase across all Stores in the recorded rates of theft, burglary, robbery, assault (physical and verbal) and other aggressive, violent and threatening behaviour (**Harmful Behaviour**), FSNI and Stores are considering the adoption of facial recognition technology (**FRT**) for the sole purpose of proactively reducing the incidence of Harmful Behaviour by repeat offenders (**Purpose**).

To determine if FRT is effective in achieving the Purpose, FSNI intends to undertake an independently designed and evaluated trial of the preferred FRT System (as defined in Section 2.4) in certain Stores (**FRT Trial**). Details of the FRT Trial are set out in Section 3 of this privacy impact assessment (**PIA**).

1.2 Purpose of this PIA

FSNI and Stores understand there are risks associated with FRT from a privacy perspective. The purpose of this PIA is to:

- (a) identify any privacy concerns and potential privacy risks arising from the use of the proposed FRT System by Stores; and
- (b) identify and provide effective strategies and recommendations to assist Stores in mitigating those risks.

In preparing this PIA, FSNI has taken into account:

- (a) the obligations of Stores under the Privacy Act 2020 (**Privacy Act**);
- (b) the Office of the Privacy Commissioner's (**OPC**) position paper on the regulation of biometrics released in October 2021 and discussion document entitled *A potential biometrics code of practice* released in July 2023;
- (c) the OPC's Privacy Impact Assessment Toolkit;
- (d) the OPC's guidance provided on its website in relation to privacy generally; and
- (e) the OPC's feedback on FSNI's proposed use of FRT.

At the end of the FRT Trial, FSNI will take into account the data collected from the trial, as well as the risks associated with FRT, in assessing whether the benefits of using the FRT System outweigh the privacy impacts.

1.3 Scope of this PIA

The scope of this PIA is limited to assessing and reviewing the potential use of the proposed FRT System by Stores for the Purpose, in particular:

- (a) how will the FRT System collect and use personal information?
- (b) how will the personal information collected by the FRT System be stored?
- (c) how will access to the FRT System be managed internally?
- (d) how long will the personal information used by the FRT System be retained?

¹ This includes New World, PAK'nSAVE and Four Square.

- (e) when and how will the personal information collected, and stored, by the FRT System be disposed of?
- (f) how will access requests relating to personal information stored in the FRT System be dealt with by Stores?

1.4 Review and consultation process

As part of the PIA, FSNI has reviewed various information sources and consulted with several internal and external stakeholders, including the OPC and a kaupapa Māori consultancy, in relation to the FRT Trial and the use of FRT in Stores more generally.

FSNI has taken into consideration the feedback to date to inform its drafting of this PIA and the resulting compliance measures in Section 4.

The feedback from FSNI's review and consultation process to date has:

- (a) confirmed the need to implement an effective tool to proactively address the harm caused to Stores, their staff and customers by the Harmful Behaviour of repeat offenders;
- (b) confirmed that FRT has the potential to meet the need identified in (a) above;
- (c) allowed FSNI to identify the privacy concerns and risks associated with the proposed use of the FRT System by Stores for the Purpose, including from a Te Ao Māori perspective;
- (d) informed the development of business and operational processes and strategies outlined in this PIA to assist Stores in mitigating those privacy concerns and risks.

FSNI will continue its review and consultation process during the FRT Trial, and will evolve and update its approach, as appropriate, to the use of the FRT System for the Purpose as the FRT Trial progresses.

2. Purpose of the FRT Trial

2.1 The problem

Between September 2022 and August 2023, Stores reported that approximately 25% of all recorded incidents were committed by repeat offenders.

Internal Store records also show that between May and June 2023, 3,900 separate incidents were recorded, a 59% increase year-on-year. During this period there were 54 separate assaults, mostly on frontline staff and 308 incidents where trespass notices had been breached by offenders, up 21% on the previous quarter.²

A list of media reports of crime in supermarkets is set out in **Appendix A**.

Police cannot successfully prosecute repeat offenders unless Stores provide sufficient supporting evidence. To assist Stores to efficiently compile the appropriate evidence from CCTV footage, Stores require a solution that proactively and accurately identifies repeat offenders.

2.2 Current methods used to address the problem

Stores currently try to prevent the recurrence of Harmful Behaviour by repeat offenders by relying on security personnel to identify repeat offenders, which is ineffective and inaccurate for a number of reasons (including the fallibility of memory and the same security personnel not being on site at all times).

Stores have also tried a number of other methods to respond to the increased prevalence of Harmful Behaviour in Stores generally, such as increasing security and training, improving store layout, electronic tagging and fog canons. Despite the use of these methods, the occurrence of Harmful Behaviour (including by repeat offenders) has continued to increase. As these methods have not specifically been designed to identify repeat offenders, they have also failed to effectively identify and reduce the number of repeat offenders.

Stores are becoming increasingly concerned and need solutions to assist them to proactively identify, record, and manage repeat offenders, allowing them to intervene before any Harmful Behaviour can occur.

2.3 Alternative options for addressing the problem

FSNI has also considered several alternative methods to proactively identify and respond to repeat offenders in an attempt to reduce the recurrence of Harmful Behaviour, such as weapon detection technology and smart CCTV cameras to identify and track suspicious behaviour. Again, these methods do not assist in proactively identifying repeat offenders.

Overall, FSNI and Stores consider that the methods currently used and the alternative options considered are not effective in assisting Stores to proactively identify repeat offenders and reduce the incidence of Harmful Behaviours.

2.4 The proposed new solution

FSNI (on behalf of its Stores) has identified FRT as a potential option to assist Stores to reduce the incidence of Harmful Behaviours by proactively monitoring for and identifying repeat offenders.

² <https://www.foodstuffs.co.nz/news-room/2023/GROCERS-REPORT-59-PER-ANNUUM-INCREASE-IN-NORTH-ISLAND-RETAIL-CRIME> (29 August 2023).

The proposed FRT System (defined below) will assess whether the image of an individual entering a Store matches an image that that Store has identified as a person of interest and, if so, will immediately alert authorised store personnel. A detailed description of how the FRT System works is provided in Section 3.

Imagus by Vix Vizion

During the trial, FSNI will use and evaluate the Vix Vizion, *Imagus* Facial Recognition Solution (**FRT System**). Founded in January 2011, Vix Vizion is an Australian company that provides facial recognition and video analytics solutions for applications in security, responsible gaming, retail, marketing and transport.

While there is limited public information on the use of the FRT System in New Zealand, in Australia, the Customer Business Services (**CBS**), a division of the South Australian Government's Attorney-General's Department, evaluated and endorsed the FRT System as an approved FRT system to identify previously barred patrons in gaming venues to prevent the recurrence of problem gambling.³ CBS assessed the FRT System as meeting its minimum technical requirements and Facial Recognition System Provider Requirements.⁴

Accuracy

The National Institute of Standards and Technology (**NIST**),⁵ an agency of the US Department of Commerce, has evaluated the accuracy and demographic bias of the FRT System.

NIST tested the FRT System against its global database of facial images and considers that the Imagus FRT System is the second best performing FRT system in the world for processing 'wild' images.⁶ 'Wild' images are those where the subject does not pose for the image e.g., images that are taken from CCTV footage.

However, as the accuracy of the FRT System has not been tested in the New Zealand context, FSNI will be implementing a number of measures to mitigate the risk of inaccuracy and bias, including the following key measures:

- (a) all authorised Store personnel will be trained on the use of the FRT System, including on the concerns relating to privacy, inaccuracy and bias;
- (b) the FRT System in each Treatment Store will be calibrated to an accuracy level of 90%, meaning only matches with an accuracy rating of at least 90% will trigger an FRT System match; and
- (c) two authorised and specially trained Store personnel must verify the FRT System match before any action is taken.

More detail is set out in Section 3.

³ [https://www.cbs.sa.gov.au/facial-recognition-technology - search "Imagus"](https://www.cbs.sa.gov.au/facial-recognition-technology - search).

⁴ <https://www.cbs.sa.gov.au/sections/LGL/facial-recognition-technology>

⁵ NIST established a Face Recognition Testing Program in 2000 to provide independent evaluations of both prototype and commercially available facial recognition algorithms. NIST has extensive experience in measuring and reporting on the accuracy and reliability of FRT and has also provided state-of-the-art technology benchmarks and guidance to the FRT industry.

⁹ <https://www.vixvizion.com/nist-report> (June 24, 2022)

3. Trial of the FRT System

3.1 Design and Evaluation of FRT Trial

FSNI has engaged an independent evaluator, Scarlatti, to design and evaluate the FRT Trial to determine: (i) if the FRT System is effective in achieving the Purpose, (ii) the privacy impacts, and (iii) whether the recommendations proposed in this PIA mitigate the privacy impacts.

The duration of the FRT Trial will be 6 months. However, FSNI may extend the trial if there are legitimate reasons for doing so and only following consultation with the Office of the Privacy Commissioner.

The FRT Trial will compare:

- (a) up to 25 Stores with the FRT System installed and in use (**Treatment Stores**); against
- (b) at least 25 comparable Stores that will not have the FRT System installed and will instead continue to rely on current methods to reduce Harmful Behaviour of repeat offenders (**Control Stores**).

3.2 Consultation during the FRT Trial

Throughout the FRT Trial, FSNI and/or its independent evaluator will engage with, and seek feedback from, staff and customers to understand the impacts of using of FRT for the Purpose, including by undertaking customer surveys.

FSNI will also establish a Māori Advisory Board to provide feedback on the FRT Trial from a Te Ao Māori perspective.

3.3 How will FSNI inform the public about its trial of FRT?

Before the FRT Trial begins, FSNI will issue a press release to inform the public about the FRT Trial. The press release will direct the public to a FRT webpage that contains a FAQ, video explainer and other information about the FRT Trial. FSNI will engage with different media channels to reach communities of interest, including Māori and Pasifika media channels.

To inform customers that the FRT Trial is in progress, all Treatment Stores will display signage at all entry points (in English and Te Reo Māori) and throughout the store.

All signage will refer to the relevant Store's privacy policy, which will contain specific information about the FRT Trial. All Treatment Store staff will be trained to direct customers, on request, to where they can find more information about the FRT Trial and Stores will have an easily accessible physical copy of their Store privacy policy.

3.4 How will Stores collect and use personal information using the FRT System?

FRT System collection

During the FRT Trial, a Treatment Store's FRT System will collect and review footage (facial images) from the FRT System cameras of all individuals that enter that store and will assign a unique, de-identified facial signature to each facial image for matching purposes. This facial signature is referred to as a 'biometric template'.

Where the FRT System does not identify the image as a match with a person of interest (defined below) that is enrolled in the watchlist within the FRT System (**FRT**

Watchlist), the image and related biometric templates will be automatically and immediately deleted.

Where a Harmful Behaviour incident occurs in a Store, authorised Store personnel will manually enrol facial images collected by the Store's CCTV system into the FRT Watchlist as set out below.

Matching of facial images

Each biometric template created by the FRT System when an individual enters the Store is matched against biometric templates of POIs in that Store's FRT Watchlist. Each Store's FRT System will be calibrated so a match will only be triggered if it is a 90% accurate match with an image of a POI in the FRT Watchlist. Section 3.6 sets out the measures that stores will take to verify a match. Non match images and related biometric templates will be automatically and immediately deleted.

FRT Watchlist Enrolment

Where a Harmful Behaviour incident occurs in a Treatment Store, authorised Store personnel will manually enrol facial images of individuals into the FRT Watchlist from that Store's CCTV footage, if they reasonably believe, based on supporting evidence, that the individual is a Person of Interest (**POI**), being an:

- (a) **Offender** – an individual that has:
 - (i) engaged in Harmful Behaviour by:
 - (A) stealing or attempting to steal from the Store;
 - (B) damaging Store product(s) and/or property;
 - (C) assaulting (physically or verbally), or behaving in a violent, aggressive, threatening or abusive manner towards, staff and/or other customers; or
 - (ii) re-entered the Store in breach of their trespass notice; or
- (b) **Accomplice** – an individual who has actively assisted an Offender in the commission of Harmful Behaviour, e.g., helps the Offender to flee the store by driving a get-away car, or hinders Store personnel from responding to the Harmful Behaviour.

Before enrolling a POI in the FRT Watchlist, two authorised Store personnel must take reasonable steps to:

- (a) confirm that the individual is a POI; and
- (b) ensure that the FRT Watchlist enrolment information is accurate, relevant and not misleading.

Authorised Store personnel are not permitted to enrol any minors or vulnerable persons (i.e., a person with a disability) into the FRT Watchlist.

Before the trial starts, two authorised personnel from a Treatment Store will also enrol Offenders from the Treatment Store's existing watchlist into the FRT Watchlist, where that store reasonably considers the Offender poses a risk to customer and/or staff safety. For example, due to previous assault, abuse, or violence, including use of weapons. The FRT System will not be turned on for matching purpose until the trial begins.

3.5 What types of personal information will the FRT System collect?

The FRT System, including the FRT Watchlist, will collect the following types of personal information (together, **Personal Information**):

Functionality	Description
Image	Images of the person captured by the Store's camera system.
Biometric template*	An encrypted digital biometric signature generated from the image. *This is the only additional personal information that Stores will collect that existing systems used by Stores do not.
POI Name	The name of the POI (if volunteered).
Behaviour*	Description of Offender's Harmful Behaviour at the time of incident, e.g., aggressive, abusive, violent, or in the case of an Accomplice, details of how they assisted the Offender. *This information is used so that staff can take appropriate action, should they need to approach or monitor that individual in the future.
Trespass notice reference ID	If applicable, the trespass notice ID. If the FRT Watchlist entry is for an Accomplice, the trespass notice ID of the Offender is also included.
Verifier name	The name of the authorised Store personnel that has verified the enrolment and/or FRT System match.

3.6 What happens if there is a FRT System match?

If the facial image collected and reviewed by the FRT System matches an image in the FRT Watchlist:

- (a) authorised Store personnel will receive an alert from the FRT System (**FRT Alert**);
- (b) two authorised Store personnel must verify the accuracy of the FRT System match;
- (c) if the match is confirmed as reasonably identical by two authorised Store personnel, the authorised personnel will respond to the FRT Alert;
- (d) once the FRT Alert is resolved, the FRT Alert is updated to confirm the match and a description of the incident will be manually added to the FRT Watchlist by one of the authorised Store personnel and verified by another authorised staff member in accordance with the process in Section 3.4;
- (e) if the match is not confirmed as reasonably identical by two authorised Store personnel, the new non-matched image and related biometric template will be automatically deleted from the FRT System within 24 hours..

Note: All authorised Store personnel that have access to the FRT System and FRT Alert will be trained to take measures to verify the accuracy of matches.

3.7 Storage and Retention of Personal Information

All personal information collected and stored within the FRT System, including the FRT Watchlist, is stored in Aotearoa New Zealand.

Where the FRT System does not identify an image as a match with a POI that is enrolled in the FRT Watchlist, the image and related biometric template will be automatically and immediately deleted.

Where a Harmful Behaviour incident occurs in a Store, authorised Store personnel will manually enrol facial images collected by the Store's CCTV system into the FRT Watchlist as set out below.

Personal information stored in the FRT Watchlist is stored for a duration of:

- (a) 3 months for an Accomplice; or
- (b) up to 2 years for an Offender.

If the trial is discontinued, all personal information will be deleted from the FRT Watchlist.

3.8 Security of Personal Information

Any personal information held in the FRT Watchlist will be securely stored in Aotearoa and will be subject to strict access controls.

Only authorised Store personnel will have access to the FRT System for the purposes described in this Section 3 and will receive training on security processes. All access to the FRT System will be logged and monitored.

3.9 Disclosure of Personal Information

The Treatment Stores will not share any information from their FRT System with any other Stores or upload any information from the FRT System into any third party programs or applications. In addition, no information stored in the FR System will be shared with FSNI or other third parties, unless this is required by law or to run and evaluate the trial (and, in the case of FSNI, to assist Stores with responding to privacy access and correction queries). In each case, the information shared will be limited to what is necessary for the purpose of review and will be subject to appropriate confidentiality obligations.

3.10 Access to and correction of Personal Information

A POI may submit an access and/or correction request to the relevant Store to review and correct any personal information about them held in the relevant Store's FRT System. Subject to the Privacy Act, access will be granted once the identity of the requestor is verified. Information will be provided in a manner that is deemed appropriate in light of the circumstances and a Store's obligations under the Privacy Act.

Removal from FRT Watchlist

A person of interest may query their enrolment in the FRT Watchlist by submitting a removal request to privacy@foodstuffs.co.nz.

The email request should set out: (i) the store the incident took place in, (ii) the date and time of the incident, (iii) what happened, and (iv) the reasons why information / image should be removed from the FR System.

The Treatment Store will consider a removal request by reviewing the information provided and assess it against the information it has collected relating to the incident.

4. Compliance with Information Privacy Principles – Privacy Act 2020

Description of Information Privacy Principle (IPP)	Compliance measures
<p>Principle 1 – Purpose of the collection of personal information</p> <p>Only collect personal information if you really need it</p>	<p>The FRT System will automatically delete all images and biometric templates that do not match with a POI (as defined in Section 3.4) immediately following the FRT System making the comparison (which happens almost instantly).</p> <p>Treatment Stores will only collect personal information to the extent necessary to identify a match and/or enrol a POI in the FRT Watchlist.</p> <p>Authorised personnel are trained to not enrol any Personal Information of minors, vulnerable persons, and non-POIs in the FRT Watchlist. Authorised personnel will also be trained on how to reasonably ascertain the age of an individual or identify a vulnerable person.</p> <p>Two authorised personnel must verify all enrolments to ensure the personal information recorded in the FRT Watchlist is necessary, accurate and reasonable.</p> <p>Personal Information of POIs within the FRT Watchlist will be automatically deleted in accordance with Principle 9 below.</p>
<p>Principle 2 – Source of personal information</p> <p>Get Personal Information directly from the people concerned wherever possible</p>	<p>Treatment Stores will only use the FRT System to collect personal information directly from an individual when they enter a Treatment Store. As discussed in Principle 3 below, Stores will take several steps to inform all individuals, where practical, that the FRT System is in operation.</p>
<p>Principle 3 – Collection of information from subject</p> <p>Tell individuals what information you are collecting, what you're going to do with it, whether it is voluntary, and the</p>	<p>FSNI will issue a media release and publish a FRT webpage, which will include a FAQ, video explainer and other information to inform the public about the FRT Trial.</p> <p>Treatment Stores will use clear and prominent signage at the entrance of Stores and at appropriate sites throughout the Store to inform all individuals about the operation of FRT and will direct individuals to the online privacy policy for further information about what is being collected, who will get the information, and the consequences of not providing the information.</p>

Description of Information Privacy Principle (IPP)	Compliance measures
consequences if they don't provide it.	All Store staff will be trained to direct customers, on request, to where they can find more information about the FRT Trial and Stores will have an easily accessible physical copy of their Store privacy policy.
<p>Principle 4 – Manner of collection of personal information</p> <p>Be fair and not overly intrusive in how you collect the information</p>	<p>Two authorised personnel will identify and verify whether an individual's image should be enrolled into the FRT Watchlist. These staff are trained to not enrol any Personal Information of minors or vulnerable persons. The FRT System will automatically delete all images and biometric templates that do not match with a POI immediately following the FRT System making a comparison</p> <p>The camera that collects images that are used by the FRT System will not be placed in any covert locations and will be clearly visible to individuals.</p>
<p>Principle 5 – Storage and security of personal information</p> <p>Take care of Personal Information once you've got it and protect it against loss, unauthorised access, use, modification or disclosure and other misuse.</p>	<p>Biometric templates cannot be accessed or extracted from the FRT System by Store staff.</p> <p>Access to the FRT System will be subject to strict access controls.</p> <p>As a condition of employment, all authorised Store personnel must sign a contractual commitment that they will not misuse, or access by any unauthorised means, any Personal Information stored in the Store systems. This will include the FRT System.</p> <p>Third party integrators of the FRT System will have no access to the Personal Information held in the FRT System.</p> <p>During the trial, FSNI and Scarlatti will run FRT System and process reviews, including to:</p> <ul style="list-style-type: none"> • check what information is being collected to ensure Stores are complying with operational guidelines; and • review FRT logs to monitor access to the FRT System and Personal Information.
<p>Principle 6 – Access to personal information</p> <p>Individuals can see their own personal information if they want to</p>	<p>FSNI will issue a media release informing the public about the use of the FRT System on a trial basis at certain Stores and how it works.</p> <p>Stores will use clear and prominent signage at the entrance of Stores and at appropriate sites throughout the Store to inform all individuals about the operation of FRT and to direct individuals to the applicable privacy policy, which outlines an individual's rights to request access to their Personal Information recorded by FRT.</p>

Description of Information Privacy Principle (IPP)	Compliance measures
	<p>All Store personnel will be trained on how to respond to access, correction and removal requests.</p>
<p>Principle 7 – Correction of personal information</p> <p>Individuals can correct their personal information if it's wrong, or have a statement of correction attached</p>	<p>FSNI will issue a media release informing the public about the use of the FRT System on a trial basis at certain Stores and how it works.</p> <p>Stores will use clear and prominent signage at the entrance of Stores and at appropriate sites throughout the Store to inform all individuals about the operation of FRT and to direct individuals to the applicable privacy policy, which outlines an individual's right to request correction and/or removal of their Personal Information recorded by the FRT System.</p> <p>All Store personnel will be trained on how to respond to access and correction requests.</p>
<p>Principle 8 – Accuracy etc. of personal information to be checked before use</p> <p>Make sure personal information is correct, relevant and up to date before you use it</p>	<p>Stores will take several steps to ensure that the Personal Information enrolled in the FRT Watchlist is accurate before it is used for the Purpose.</p> <p>The FRT System will be calibrated so a match will only be triggered if it is a 90% accurate match with an image of a POI in the FRT Watchlist.</p> <p>Before any Personal Information can be enrolled into the FRT Watchlist, two authorised personnel must: (i) verify and confirm the match and/or that the image is that of the POI; and (ii) take reasonable steps to ensure that the information inputted into the FRT Watchlist is accurate, relevant and not misleading.</p> <p>To mitigate the risk that images enrolled into the FRT Watchlist are not taken out of context, authorised personnel are trained to record a factual description of behaviour at the time of the incident and contextual background into the FRT Watchlist.</p> <p>To ensure that the Personal Information is up-to-date and relevant, the FRT Watchlist will only hold Personal Information of: (i) Offenders for up to 2 years from the date of enrolment, and (ii) Accomplices for 3 months from the date of enrolment. All other Personal Information is automatically and immediately deleted from the FRT System if the FRT System does not identify a match with a POI.</p> <p>Integrators are hired to install, configure, and implement the FRT System for Stores. The agreements between Stores and integrators will contain contractual commitments from integrators to ensure that the FRT System is correctly implemented and that any issues are promptly remedied.</p>

Description of Information Privacy Principle (IPP)	Compliance measures
<p>Principle 9 – Not to keep personal information for longer than necessary</p> <p>Get rid of personal information once you're done with it</p>	<p>Unless authorised personnel enrol a POI's Personal Information into the FRT Watchlist, the FRT System will automatically and immediately delete all images that the FR System does not identify as a match with a POI.</p> <p>The FRT Watchlist will only hold Personal Information of: (i) Offenders for up to 2 years from the date of enrolment, and (ii) Accomplices for 3 months from the date of enrolment. After the enrolment period, the information will be automatically deleted.</p>
<p>Principle 10 – Limits on use of personal information</p> <p>Use Personal Information only for the purpose you collected it, unless one of the exceptions apply</p>	<p>Store staff will undergo privacy and FRT System specific training and refresher courses which make it clear that Personal Information may not be used for any purpose other than the Purpose.</p> <p>To mitigate the risk of misuse of Personal Information by authorised personnel, Personal Information is subject to a number of security controls and authorised Store personnel that have access to the FRT System will provide contractual commitments in relation to the security and use of Personal Information.</p> <p>To ensure that Personal Information is only enrolled into the FRT Watchlist for the Purpose for which it was collected, two authorised personnel are required to verify the match and the reason for enrolment before an image is enrolled.</p>
<p>Principle 11 – Limits on disclosure of personal information</p> <p>Only disclose Personal Information if you have a good reason, unless one of the exceptions applies</p>	<p>Stores will only disclose Personal Information held by the FRT System as set out in Section 3.9.</p> <p>Staff will be provided with privacy training that covers disclosure of Personal Information, and what to do in the event of an accidental or unauthorised disclosure.</p> <p>All authorised Store personnel who will have access to the FRT System will provide contractual commitments that they will not use or disclose Personal Information in an unauthorised manner.</p>
<p>Principle 12 – Disclosure of personal information outside of NZ</p>	<p>Personal Information held by the FRT System is stored only in Aotearoa and is not held or processed by any third-party providers outside of Aotearoa.</p> <p>See more about unauthorised or accidental disclosure under Principle 11.</p> <p>Integrators will have no access to the data held in the FRT System.</p>

Description of Information Privacy Principle (IPP)	Compliance measures
<p>Principle 13 – Unique identifiers</p> <p>Only assign unique identifiers where permitted</p>	<p>The unique identifier assigned by the FRT is not the same as any other unique identifier assigned by another agency.</p> <p>Staff will be provided with training to ensure that they do not record any other unique identifiers.</p>
<p>Mandatory breach notification requirements</p>	<p>Staff will be trained on what to do in the event of an accidental or unauthorised disclosure of Personal Information stored in the FRT System.</p>

Appendix A - Media Reports of Store Incidents

Incidents of abuse and assaults on staff and customers across both FSNI and Countdown stores have increased, being reported in both local and global media.

<https://www.rnz.co.nz/news/national/507709/new-world-supermarket-security-guard-stabbed-in-auckland> (January 2024)

<https://www.stuff.co.nz/national/crime/300965536/women-steal-upwards-of-40000-worth-of-groceries-from-auckland-supermarkets> (September 2023)

<https://www.foodstuffs.co.nz/news-room/2023/GROCERS-REPORT-59-PER-ANNUM-INCREASE-IN-NORTH-ISLAND-RETAIL-CRIME> (August 2023)

<https://www.stuff.co.nz/national/crime/300959591/supermarket-crime-increases-by-nearly-60-over-past-year-report-shows> (August 2023)

<https://www.foodstuffs.co.nz/news-room/2023/Grocers-record-almost-40-percent-increase-in-North-Island-Retail-Crime> (June 2023)

<https://www.nzherald.co.nz/nz/foodstuffs-reports-a-nearly-40-per-cent-increase-in-retail-crime-increase-in-violent-attacks-on-staff-alarming/RXUBEDFOT5GSXMIGHCKLRAHE6E/> (June 2023)

<https://www.newshub.co.nz/home/new-zealand/2023/04/smash-and-grab-at-auckland-supermarket-staff-inside.html> (April 2023)

<https://www.stuff.co.nz/national/126182342/security-guard-allegedly-punched-and-had-trolley-hurled-at-him-during-incident-at-wellington-new-world> (August 2021)

<https://www.1news.co.nz/2021/09/14/paknsave-security-guard-assaulted-by-woman-who-refused-to-wear-mask/> (September 2021)

<https://www.nzherald.co.nz/nz/supermarket-arson-fire-lit-in-trolley-at-west-auckland-paknsave/MEBEMZ64MULPKHEOEZGJ7KQ7AU/> (May 2021)

<https://www.newshub.co.nz/home/new-zealand/2021/08/covid-19-north-shore-4-square-workers-praised-for-patiently-dealing-with-inconsiderate-abusive-woman-refusing-to-wear-mask.html> (August 2021)

<https://www.rnz.co.nz/news/national/450699/man-shot-dead-at-countdown-supermarket-in-auckland> (September 2021)

<https://www.theguardian.com/world/2021/may/10/dunedin-stabbing-attack-new-zealand-countdown-supermarket> (May 2021)

<https://www.newshub.co.nz/home/new-zealand/2021/05/reports-of-stabbing-incident-at-supermarket-in-dunedin.html> (May 2021)

<https://www.nbcnews.com/news/world/new-zealand-police-kill-violent-extremist-after-he-stabs-6-n1278443> (September 2021)