

PRIVACY POLICY

ALL STRATA MANAGEMENT SERVICES

All Strata Management Services is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. All Strata Management Services provides strata title management and strata company services. We ensure we keep current with new strata laws to provide sound risk management solutions.

We have adopted the National Privacy Principles contained in the Privacy Act 1988 (the **Privacy Act**). The National Privacy Principles govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Federal Privacy Commissioner at www.privacy.gov.au.

What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone numbers and property details.

This Personal Information is obtained in many ways including strata rolls, correspondence, by telephone, by email, via our website www.allstrata.com.au, by notices or information issued to us pursuant to Section 105 of the Strata Titles Amendment Act 2018 (the **Act**).

The types of personal information we collect from or about you are predominantly set out in Section 105 (4) of the Act, we collect your Personal Information for the primary purpose of providing our services to you, and providing information to our clients. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. An example of this is providing your details to a tradesperson so that they may contact you to make a repair.

We generally collect and hold personal information about:

- ❖ Our employees;
- ❖ Contractors who provide service to All Strata management Services;
- ❖ Our strata companies under our management;
- ❖ Lot proprietors, occupants and other parties within the strata company under our management;
- ❖ Job applicants;
- ❖ Other people who come into contact with All Strata Management Services.

The types of personal information we collect include:

- ❖ Your legal name;
- ❖ Your business and trading names;
- ❖ Your residential and/or business address and contact details;
- ❖ Your email address;

- ❖ The website address and the domain type of your organisation and/or business;
- ❖ The telephone, facsimile, postal and street addresses of the strata company, and proprietors and occupants within the strata company; and
- ❖ The subject matter or the enquiry or message.

We also collect your personal information in order to satisfy our regulatory obligations under applicable laws and rules.

In some cases, your information may be disclosed where required or authorised by law, for example, to government and regulatory authorities or in emergency situations and when assisting in lawful enforcement. When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- ❖ For the primary purpose for which it was obtained
- ❖ For a secondary purpose that is directly related to the primary purpose
- ❖ With your consent; or where required or authorised by law

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such cases, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Section 110 (2) of the Act provide that, in certain circumstances, information recorded on the strata roll of strata schemes managed by our company must be made available to an owner, mortgagee or their authorised agent. Usually the information provided pursuant to these requests is restricted to information about the lot/s in which the requesting owner, mortgagee or their agent has an interest and the common property of the strata scheme. However, while examining the information provided under Section 110 (2) of the Act, inspecting owners, mortgagees or their agents may obtain access to information about lot/s other than the lot/s in which they have an interest.

We have no control over what use these persons may make of any such information they may obtain and we may not be reasonably able to restrict their access to this information.

Pursuant to Section 105 (5) of the Act, when the responsibility to maintain the strata roll by an elected Secretary has been delegated to our company, however that does not prohibit the

Secretary from gaining access to the strata roll and all information required by Section 110 of the Act is contained therein. However, we do not permit access to such persons any additional information we may have that is not required when complying with Section 110 of the Act.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- ❖ Third parties where you consent to the use or disclosure; and
- ❖ Where required or authorised by law

Disclosure of the personal information of others to you

Subject to the provisions of Section 43 of the Act as set out in the preceding paragraph, we are not able to disclose personal information about others who have or have had an interest in a strata scheme managed by our company. This includes persons who may have provided services or amenities to a strata scheme including the original builder or developer of the strata scheme property, unless those persons have granted consent for the disclosure.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse, loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.

However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years or as required by law.

Transmission of data on the internet can never be ultimately secure. We do not and cannot guarantee security of information collected electronically or transmitted; however we take all necessary steps to provide the best security available.

All Strata Management Services may store your data using overseas cloud storage products as well as other overseas information technology products and services, where we reasonably believe that the overseas recipient is subject to laws that protect the information in a substantially similar way to the Australian Privacy Principles. We will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

Access to your Personal Information

You may contact us to request access to personal information that we hold about you, and may notify us of any corrections which need to be made, as permitted and required by law. Personal information provided by you can be updated by you if the information provided is incorrect or out of date, as permitted and required by law.

We will investigate and deal with your correction request or complaint in a fair, efficient and timely manner.

All Strata Management Services may deny access to information in certain circumstances as permitted by law. For example, there are exemptions as specified in the Australian Privacy Principles where access may be denied. If this is the case, we will provide you with the reason for our decision.

If you are not satisfied with our handling of your matter, you have a right to complain to the Office of the Australian Information Commissioner. We suggest you do this only once you have first followed our internal complaint process. The contact details are set out below:

Office of the Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001
Web: www.oaic.gov.au

To protect your Personal Information, we may require proof of identity from you before releasing the requested information.

Contact us

If you wish to access or correct your personal information or make a complaint in relation to your privacy, please contact our Privacy Officer on (08) 9227 8966 or by email at admin@allstrata.com.au.

Further information about privacy rights

For further information about the Australian Privacy Principles of the Privacy Act please visit the Office of the Australian Information Commissioner website at www.oaic.gov.au.

This document does not create any additional rights under contract, statute or equity law.

Policy Updates

This Policy may change from time to time and is available on our website.

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