

# Privacy Policy

## INTRODUCTION

Strata One Pty Ltd (ABN 56 143 664 484) is an independent Body Corporate and Community Title Management company in Australia. References to "we", "us" and "our" in this Privacy Policy refer to Strata One Pty Ltd. This document is our privacy policy, and it tells you how we collect and manage your personal information.

## PURPOSE

Strata One is committed to this privacy policy in order to ensure we respect your rights to privacy under the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act). The APPs are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is collected, stored, used, disclosed, and accessed.

## DEFINITION OF PERSONAL INFORMATION

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act as information or an opinion relating to an identified, or reasonably identifiable, individual. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## POLICY

This policy explains the types of personal information that we may collect and hold, how that information is used and with whom the information may be shared. Under the Security of personal information, Strata One must take reasonable steps to protect personal information it holds from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure.

### Data Collection

*Why do we collect personal information?*

Strata One collects your personal information so that we can perform our business activities and functions and to provide best possible quality of customer service.

### *What personal information may be collected?*

We may collect the following types of personal information:

- name
- mailing or street address
- email address
- telephone number
- registration / licence number
- on occasion a bank account number for owner refunds
- any additional information relating to the purchase, sale, or rental of your property that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our office, customer surveys or visits by our representatives from time to time

### **We do not actively collect sensitive information.**

#### *How is personal information collected?*

We collect your personal information directly from you or through a legal representative when a settlement occurs. When collecting personal information from you, we may collect in ways such as:

- through your access and use of our website
- during verbal or written conversations between you and our representatives
- when you submit an electronic or written application or registration

We may also collect personal information from third parties including, but not limited to:

- property managing agents
- lot owners
- building managers
- third party companies such as banks after a transfer is made
- law enforcement agencies
- other entities when a settlement occurs

### Data Storage

Strata One takes reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification, or disclosure. We may hold your information in either electronic or hard copy form. Information collected by Strata One while you are accessing our services will be stored online in the database. Paper files are stored in a secure location. Our online systems have security protection software.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk. Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website, and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Where Strata One no longer needs personal information for any purpose for which the information may be used or disclosed under the APPs, Strata One must take reasonable steps to destroy the information or ensure that it is de-identified. This requirement applies except where:

- (a) the personal information is part of a Commonwealth record, or
- (b) Strata One is required by law or a court/tribunal order to retain the personal information

### Data Use & Disclosure

Strata One will use and disclose your personal information where required by law, with your consent, or where permitted by law for the following purposes:

- to maintain the owner's corporation strata roll
- to answer enquiries and provide information or advice about your strata plan
- to provide you with access to protected areas of our website and owners portal
- to assess the performance of the website and to improve the operation of the website and our services
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties such as a bank or solicitor
- to provide your updated personal information to our related bodies corporate, contractors or service providers when maintenance is required
- to update our records and keep your contact details up to date in accordance with Strata Regulations
- to issue statutory certificates
- to maintain the common property requiring access to a Lot
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision, or direction of a regulator, or in co-operation

with any governmental authority of any country (or political sub-division of a country)

- We may use your personal information for direct marketing communications and information about our products and services that we consider may be of interest to you in various forms, including mail, SMS, and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list. We do not provide your personal information to other organisations for the purposes of direct marketing.

We may disclose your personal information to:

- your related body corporate
- our employees, related members of your bodies corporate, contractors or service providers for the purposes of operation or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, the maintenance of your strata plan, mailing, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants
- any organisation or person for authorised purpose with your express written consent

Strata One will only use the personal information collected for the purposes for which it was collected, or other purposes that are agreed. Additional purposes may be required to comply with legislation. If this is the case, Strata One will communicate to the client that this has occurred. Your personal information will not be shared, sold, rented, or disclosed other than as described in this Privacy Policy.

#### Access by an Individual

You may request access to any personal information we hold about you at any time by contacting us via phone or email. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information, we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

#### **CONTACT US**

If you believe that your privacy has been breached, please contact us via email to [enquiries@strataone.com.au](mailto:enquiries@strataone.com.au) and provide details of the incident so that we can investigate it. You may also make a formal complaint with the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)). We will treat your requests or complaints confidentially and will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

If you have any queries or concerns about this privacy policy, please contact us via email to [enquires@strataone.com.au](mailto:enquires@strataone.com.au) or via post to Strata One, PO Box 889, Narrabeen NSW 2101.