



## **Owners Corporation Strata Plan (SP) 78122**

### **Privacy Policy**

This Privacy Policy deals with the collection, security, use and disclosure of personal information gathered by us, The Owners Corporation SP78122, Avanti Apartments pursuant to the Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles set out in Schedule 1 of that Act.

#### **Collection**

The Owners Corporation collects Personal Information (as defined in Section 6 of the Privacy Act 1988 (Cth)) in connection with managing the business of the scheme, ("Primary Purpose"). Personal Information is collected directly from the individual, in the course of the Owners Corporation's relationship with the owner and/or tenant of a lot in the scheme and from third parties. If Personal Information is not collected we may not be able to deal with you, or provide you with our services efficiently.

The kind of information that is collected may include your name, address, telephone number, email address, details of other residents of a lot, employees of commercial lot and motor vehicle details. For contractors, the Building Manager is required to collect data for Work Health and Safety purposes, concerning licences, training and associated data.

We only collect sensitive information with your consent or when we are authorised to do so by law. Sensitive information is defined as being any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, member of a trade union, sexual orientation or practices, criminal record, genetic information, biometric information or health information.

#### **When you visit our websites, we may collect information when:**

- (a) registering or subscribing to our information services
- (b) contacting us for any enquiry or query or feedback or comment or lodging a complaint.

Non personally identifying information:

- In addition to the information you specifically provide in (a) and (b) above, we gather statistical data from our web site using analytics software to collect information about the number of visitors coming to the site. No identifying information is collected using the analytics software. The software records the IP address of the visitor only. We use this information to improve our website performance, and to determine which areas of our web site are most popular.
- We also use 'cookies'. Cookies are pieces of information that a web site can transfer to an individual's computer in order to allow that web site to store information about user preferences. We use cookies to provide information on our product/service offerings through content networks across the internet, to track your interaction with our website and to personalise your experience on our website. The cookies expire once the visitor leaves our web site. It is possible to adjust your Internet browser to refuse cookies, but you may find that this reduces the functionality and user experience of this site.

### **Other demographic information**

If you respond voluntarily to our surveys or other interactive communications, we collect the responses and use the information to improve the quality of our customer service.

### **Use and Disclosure**

We collect and use your personal information to deliver our services to you. Personal Information will be collected, held, used and disclosed in a manner to ensure that the Owners Corporation is able to fulfil all of its functions and duties in addition to its legislative obligations under Strata Schemes Management Act 1996 (NSW), Community Land Development Act 1989 (NSW), Community Land Management Act 1989 (NSW), and associated regulations. Personal information is used or disclosed in connection with the Primary Purpose (eg providing management services to you); or after having obtained your consent, either expressly or by implication; or where we are entitled or required to. The information provided by you to the Owners Corporation will be used to, for example:

- a) obtain and update insurance policies;
- b) aid in identification of products and services which may be required by you;
- c) maintain our relationship with you;
- d) comply with legislative and regulatory requirements;
- e) issue notices;
- f) maintain and replace damaged property.

We may use your Personal Information to provide you with information about new services, committee updates, important announcements, news updates, service updates, customer satisfaction survey. Please unsubscribe in the email you receive if you do not want to receive any of this information.

### **Disclosure of your information to third parties**

We may be required to disclose your information to third parties. For example, we may be required to provide information if required by law or regulation.

We may also supply your personal information on a confidential basis to our external service providers so they can assist with performing services on our behalf. Our relationships with such external service providers are governed by our contracts with them. Those service contracts contain privacy and confidentiality provisions which are consistent with the Australian Privacy Law obligations.

The Owners Corporation is unlikely to disclose Personal Information to overseas recipients.

### **The Owners Corporation's Internet Privacy Policy**

If you visit an unsecured area of our website (where you are not required to log on) to browse or download information, we may record the date and time of your visit, the page that you viewed, the path you followed to get there and the information, if any, that you downloaded. This information cannot be used to personally identify you. The information is used for statistical and maintenance purposes which aid with the continual evaluation of the website.

We take all reasonable steps to ensure that your information is properly protected from unauthorised access, disclosure or modification. Our security measures include, but are not limited to, encrypting the data sent from your computer to our server, firewalls and virus scanning tools. Any information so collected is stored on our server, which can only be accessed by our authorised people.

We do not use any information collected from our website to send unsolicited advertising material (SPAM) to your computer.

Other information may be collected when you send us a query via email.

### **Online Enquiries**

When sending us an email from our web page, our form may ask you for your email address or contact phone number, amongst other information, to ensure that your query can be dealt with efficiently. It is your choice as to whether you provide such additional information. However, the form will indicate the information that is essential for your query to be dealt with. The information that you do provide is only used for the purposes of responding to or otherwise dealing with your query.

### **Access, Correction and Complaints**

We are required to take such steps as are reasonable to ensure that the information we collect, use or disclose is accurate, complete and up-to-date. For that reason it is IMPORTANT for you to know that:

- a) you have the right to request access to any information which relates specifically to you;
- b) you have the right to request the correction of any information that relates to you which is inaccurate. However, please note that any such request must be made in writing to us.

Please note that in accordance with the Privacy Act 1988 (Cth) we may refuse access to Personal Information. For example, we will refuse access if such access would be an unlawful act or would result in the breach of another person's privacy. The Owners Corporation reserves the right to recover any reasonable cost in connection with providing access to Personal Information except where the Privacy Act 1988 (Cth) provides otherwise.

If you have any questions about this policy or if you wish to access or update information we hold about you or wish to make a complaint about a breach of the Australian Privacy Principles, please write to:

The Privacy Officer, Executive Committee, Strata Plan SP 78122, Avanti Apartments, 510/90 George Street, Hornsby, NSW 2077

You can also telephone The Owners Corporation via The Strata Manager (SP78122) at Body Corporate Services Pty Ltd on 02 8216 0397.

Complaints with respect to the breach of the Australian Privacy Principles will be reviewed by the Owners Corporation's Privacy Officer, who will investigate and consider each complaint on a case by case basis and respond to the complainant in a manner we deem appropriate in the circumstances.

We are confident in the manner that we protect your privacy. Rest assured that your information is protected from misuse, interference, loss, unauthorised access, modification and disclosure. Any information that is no longer required for the purposes for which it was collected or for the purpose of conforming with laws is destroyed. All files, letters, correspondence and any other document or electronic data that is no longer required is disposed of properly.

From time to time we may update our Privacy Policy. The most current version will usually be available on our website [www.avantiapartments.com.au](http://www.avantiapartments.com.au)

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