



Alamanda Estate Owners Corporation - Privacy Policy

The last update to this document was **15 September 2020**

Introduction

The Alamanda Estate Owners Corporation (No. PS 604255) (**Alamanda OC, we, us, our**) is the owners corporation for Alamanda Estate located at 2-10 Paradise Parade Point Cook, Victoria 3030. We are committed to complying with applicable privacy laws in relation to the personal information that we collect in the course of performing our functions.

Where applicable privacy laws provide for exceptions or exemptions, we may rely on those exceptions or exemptions in our information handling practices.

Please take a moment to read our Privacy Policy as it explains how we manage personal information including our obligations and your rights in respect of our dealings with your personal information.

Key definitions

In this document:

- **"APPs"** means the Australia Privacy Principles set out in the Privacy Act;
- **"personal information"** has the meaning set out in the Privacy Act, and (in summary) means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether true or otherwise;
- **"Privacy Act"** means the *Privacy Act 1988* (Cth); and
- **"sensitive information"** has the meaning set out in the Privacy Act and includes certain specific types of personal information such as health information, and information about a person's racial or ethnic origin, sexual orientation, religious beliefs or affiliations and criminal record.

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you.

We may collect the personal information you directly give us through some of the following means:

- (a) when you contact us via telephone, e-mail, through the Alamanda Estate website at www.alamandaonline.com.au (the **Website**) or other means;
- (b) if you are an Alamanda Estate lot owner or tenant, when you register an account for the Website and participate in our facility induction training;
- (c) when we perform our functions and responsibilities as the owner's corporation for Alamanda Estate;
- (d) when we arrange services and products that you have requested (for example, when you book Alamanda Estate facilities, register for classes and events, submit maintenance requests,); and
- (e) when administering any contracts, we have with our contractors and service providers.



Alamanda Estate has a biometric security system that restricts access to certain facilities and areas using biometric scanners. If you wish to access these facilities and areas, you will need to be registered with the security system and provide an initial biometric scan. Please refer to the "Premises Security" section of this Privacy Policy below for further details.

In certain cases, we may collect personal information from publically available sources or from third parties, such as insurers, real estate or rental agents, solicitors and conveyancers, owner's corporation managers, tradespeople and other contractors, suppliers, contractors and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The type of personal information we may collect will depend on the nature of our relationship with you and can include (but is not limited to) information such as your name, address, lot number, levy balances and payment history, email address, phone numbers, date of birth, billing information and tax information.

In general, we will only collect personal information about you where it is reasonably necessary for one or more of our functions or activities. This Privacy Policy provides an overview of some of our key functions and activities that involve the collection and use of personal information.

As an owner's corporation, we are required by law to collect and hold certain records in relation to lot owners and the lot entitlements, lot liabilities and financial position of each lot.

We only collect sensitive information about you with your consent, or otherwise in accordance with applicable laws.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services.

3. Our purposes for handling your personal information

As a general rule, we only handle personal information for purposes that would be considered relevant and reasonable in the circumstances.

Some of the purposes for which we collect, hold, use and disclose personal information include:

- (a) confirming your identity;
- (b) discharging our functions and responsibilities as the owner's corporation for Alamanda Estate, which include (but are not limited to):
 - (i) administering and managing the common property and facilities of Alamanda Estate, including by:
 - (A) attending to routine repairs and maintenance;
 - (B) arranging upgrades and improvements; and
 - (C) managing the security and safety of these areas;
 - (ii) complying with our record keeping obligations;



- (iii) providing access to owner's corporation records as required by law (this includes, for example, providing certificates to prospective purchasers regarding the lot entitlements, lot liabilities and financial position of a lot (including any outstanding arrears));
 - (iv) conducting meetings and facilitating decisions of the owner's corporation (including by issuing notices and agendas, managing voting arrangements (including proxies) and maintaining minutes of meetings and resolutions);
 - (v) maintaining correspondence files with lot owners and residents; and
 - (vi) managing the financial affairs of the owner's corporation, such as:
 - (A) administering the owner's corporation budget;
 - (B) managing owner's corporation levies (including by issuing levy notices, processing payments and taking action to recover levy arrears); and
 - (C) obtaining and maintaining insurances; and
 - (vii) attending to inquiries, and resolving disputes, regarding the Alamanda Estate common property and facilities;
- (c) arranging and managing services that you have requested (such as maintenance and repairs);
 - (d) operating the facilities and providing services offered at Alamanda Estate (including classes, activities and events);
 - (e) providing you with updates and information about the Alamanda Estate facilities and services;
 - (f) operating the Website and protecting the security and integrity of the Website;
 - (g) developing and improving the Alamanda Estate facilities, services and the Website; and
 - (h) complying with our legal and regulatory obligations.

4. Who we disclose your personal information to

The types of persons, agencies and entities we typically disclose personal information will depend on the nature of our relationship with you, and the purposes for which we are handling your personal information.

By way of example, these may include (but are not limited to):

- (a) the owner's corporation manager (as appointed by the owner's corporation committee from time to time);
- (b) lot owners and residents of Alamanda Estate (where we are dealing with an issue that involves that lot owner or resident);
- (c) third parties who are authorised by law to request access to owner's corporation records (such as prospective buyers);
- (d) third parties who provide services at Alamanda Estate (such as maintenance staff and service providers who facilitate classes, activities and events at Alamanda Estate);



- (e) third party businesses and service providers that are engaged by current or prospective Alamanda Estate residents (such as insurers, real estate or rental agents, solicitors and conveyancers, tradespeople and utility companies); and
- (f) our suppliers, contractors and professional advisors.

Our Website includes functionality that allows users to connect with each other and post information to open forums on the Website. Please carefully consider what information you choose to share with other users and post on the Website.

We may also disclose your personal information in accordance with any consent you give or where disclosure is authorised, compelled or permitted by law.

If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

5. Protection of personal information

We hold personal information in the form of physical and electronic records. We use a range of security measures to protect the personal information that we hold. These include using IT security tools to protect our electronic records, implementing premises security to restrict access to physical records, and ensuring that we exercise appropriate oversight of staff and contractors who have access to records containing personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

6. Premises security (biometric security system)

To protect the safety of Alamanda Estate residents we have improved the security of Alamanda Estate facilities by installing a biometric security system that uses biometric scanning to restrict access to certain areas and facilities within the premises of Alamanda Estate.

Any Alamanda Estate residents, lot owners, staff and contractors who wish to access these secured areas must complete induction training and become registered with the biometric security system by providing an initial scan.

A more detailed privacy collection notice will be provided as part of this induction and registration process.

7. Direct marketing

We may provide you with information about products, services and promotions either from us, or from third parties which may be of interest to you.

You may opt out at any time if you no longer wish to receive direct marketing messages from us. You can make this request by contacting our Privacy Officer.

8. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

We may use third party vendors to show our ads on sites on the Internet and serve these ads based on a user's prior visits to the Website. We may also use analytics data supplied by these vendors to inform and optimise our ad campaigns based on your prior visits to the Website.



9. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from your reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We endeavour to respond to all requests for access to or correction of personal information within a reasonable time.

10. Overseas transfers of personal information

Alamanda Estate is located in Victoria, Australia. As the owner's corporation for Alamanda Estate, we primarily handle personal information for the purposes of managing issues relating to the premises of Alamanda Estate. In most cases, these activities do not require us to disclose personal information to recipients outside of Australia. Our service providers are located in Australia.

From time to time, we may disclose personal information to overseas recipients where this is necessary in connection with the affairs of an individual lot (for example, where a prospective buyer who is located overseas requests details regarding the lot or Alamanda Estate).

Owners corporation notices and minutes (which may contain certain personal information) are also circulated to all lot owners, and some of these lot owners may be located outside of Australia.

11. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer

Zach Tay – Owners Corporation Manager

MICM Property – 178 City Road, Southbank Vic 3006

Telephone - Direct: (613) 8256 1156 Office: (613) 9697 8888

Email - zacht@micm.com.au

We take all complaints seriously and will respond to your complaint within a reasonable period.

12. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.