

# Privacy Policy

Stratablox Pty Ltd (ABN 67 655 104 582) (“Stratablox”, “we”, “us”, “our”) is committed to protecting the privacy of individuals whose personal information we collect and hold in the course of providing owners corporation management services.

This policy explains what personal information we collect, why we collect it, how we use and disclose it, and your rights in relation to that information.

## 1. Collection of personal information

We collect personal information from you, including your:

- name
- residential address
- contact information (including phone number and email address)

### Information we do not collect

We do not collect or hold credit card or other payment card details, government-issued identity documents (such as drivers licences or passports), tax file numbers, or medical information.

We may hold your BSB and bank account number if you have provided it to us for the purpose of receiving a reimbursement, or if you are a contractor providing services to an owners corporation we manage. In all other circumstances, we do not collect or retain bank account details.

## 2. Why we collect personal information

We collect your personal information for two reasons.

First, collection is required by law. Under section 148 of the Owners Corporations Act 2006 (Vic), every owners corporation must establish and maintain a register containing the name and address of each lot owner. This is a statutory obligation that cannot be waived.

Second, we collect and use personal information to effectively manage the owners corporation on behalf of its members. This includes:

- **Communications and meetings.** Issuing notices of annual and special general meetings, distributing minutes, corresponding with lot owners about resolutions, proxies, and voting, and responding to general owner enquiries.

- **Financial administration.** Issuing levy notices, processing payments, pursuing arrears, and administering the owners corporation's budget and financial records.
- **Maintenance and works.** Coordinating repairs and maintenance of common property, obtaining quotes, engaging contractors, and notifying affected lot owners of scheduled works.
- **Insurance.** Administering the owners corporation's insurance policies, including processing claims and corresponding with insurers where a lot owner's property or conduct is relevant to a claim.
- **Dispute resolution.** Corresponding with lot owners, occupiers, and their representatives in connection with disputes, complaints, breaches of owners corporation rules, and proceedings before VCAT or any court.
- **Statutory compliance.** Meeting obligations under the Owners Corporations Act 2006, the Owners Corporations Regulations 2018, and any other applicable legislation, including responding to requests for information and producing certificates under section 151 of the Act.
- **Emergency and safety matters.** Contacting lot owners or nominated contacts in connection with emergencies, safety incidents, or urgent works affecting the common property or individual lots.

### 3. Providing this information is not optional

The collection of your name and address is mandated by the Owners Corporations Act 2006. If you do not provide your contact information, we will be unable to reach you in relation to the general business of the owners corporation, including notices of meetings, levy correspondence, decisions affecting your lot, and maintenance works affecting common property or your individual lot. Your ability to participate in the owners corporation and remain informed of matters that directly affect your property may be significantly compromised as a result. Furthermore, if we do not have a means to contact you then owners corporation fee notices may not be received by you which could result in penalty interest and debt recovery actions against you.

### 4. Who we share your information with

Besides our staff, we share personal information with third parties only to the extent necessary to manage the owners corporation effectively and meet our legal obligations. This includes:

- **Contractors and tradespeople.** Where works or inspections relate to an individual lot, we may provide relevant contact or access information to contractors and tradespeople engaged to carry out those works.

- **Debt collection agencies.** Where levy arrears remain unpaid, we may refer the matter to a debt collection agency. This will involve disclosing relevant personal and financial information necessary to pursue recovery of the outstanding amount.
- **Legal representatives and tribunals.** Where a dispute, breach, or other matter proceeds to legal action or to the Victorian Civil and Administrative Tribunal (VCAT), we may disclose personal information to our legal representatives and to the tribunal or any court as required by those proceedings.
- **Lot owners, agents, and purchasers.** Under sections 146 and 150 of the Owners Corporations Act 2006, the owners corporation register must be made available for inspection to lot owners, mortgagees, purchasers, and their authorised representatives. Personal information contained in the register may therefore be accessible to these parties upon request.

## 5. Register inspection — mandatory disclosure

Under sections 146 and 150 of the Owners Corporations Act 2006, we are legally required to make the owners corporation register and records available for inspection, free of charge, upon request by a lot owner, mortgagee, purchaser, or their authorised representative. We have no discretion to refuse a valid request for inspection. A copy of the register or any part of it may also be provided upon payment of a reasonable fee. This means that your name and address, as recorded on the register, may be disclosed to other parties who make a valid request under the Act.

Under section 172 of the Act, a person whose name or other personal information is kept on the owners corporation register or in the owners corporation's records may apply to VCAT for an order restricting access to that information. VCAT may make such an order if it is satisfied that exceptional circumstances exist. An order may specify conditions, including identifying particular persons who are not to have access to the information, and will apply for the period specified by VCAT.

Unless and until we are formally notified of a VCAT order made under section 172, we are not in a position to know that any such order exists and must proceed on the basis that no restriction applies. If you have obtained or are seeking such an order, you must notify us directly and provide a copy of the order before we can give effect to any restriction on access to your information.

If you believe exceptional circumstances exist that warrant restricting access to your personal information, you should seek independent legal advice about making an application to VCAT under section 172.

## **6. Overseas transfer**

The primary software platform we use to manage and store personal information is Urbanise Strata Management, which stores data on Amazon Web Services servers located within Australia. Data held on Urbanise is therefore not subject to overseas transfer.

Some other third party software platforms and service providers we use may be based outside of Australia, or may store data on servers located overseas. By providing your personal information to us, you acknowledge that your information may be transferred to and stored by overseas recipients in connection with those platforms. We take reasonable steps to share information only with reputable overseas recipients that are expected to handle your personal information in a manner consistent with the Australian Privacy Principles under the Privacy Act 1988 (Cth), however you should be aware that overseas recipients may be subject to the laws of their own jurisdiction, which may not afford the same level of protection as Australian privacy law.

## **7. Data retention and transfer**

We retain personal information for as long as we remain the manager of the relevant owners corporation. If our management appointment comes to an end, all records, including personal information held on the owners corporation register, will be transferred in full to the incoming manager or, if no manager is appointed, returned to the secretary of the owners corporation. We do not delete or destroy personal information upon the cessation of our appointment.

## **8. Data security**

We take reasonable steps to protect the personal information we hold from misuse, interference, loss, and unauthorised access, modification, or disclosure. This includes physical, electronic, and administrative safeguards appropriate to the nature of the information held. While we endeavour to protect your personal information, no method of storage or transmission is completely secure, and we cannot guarantee absolute security.

## **9. Your rights**

You have the right to request a copy of any personal information we hold about you, and to request that it be corrected if it is inaccurate. To make such a request, please contact us at:

Email: [office@stratablox.com.au](mailto:office@stratablox.com.au)

Phone: (03) 9070 5060

## **10. Complaints**

If you believe we have mishandled your personal information or breached your privacy, we encourage you to contact us in the first instance so that we can attempt to resolve your concern. If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au) or by calling 1300 363 992.

## **11. Updates to this Policy**

We may update this privacy policy from time to time to reflect changes in our practices or legal obligations. The current version of this policy will always be available on our website. We encourage you to review this policy periodically. Where changes are material, we will take reasonable steps to notify affected individuals directly.