



The Community Managers Pty Ltd
t/as tcmstrata

Privacy Policy

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Version No: V1017	Drafted by: Nicki Scrivener (NS)

Privacy Policy

The Community Managers Pty Ltd trading as tcmstrata (“TCM”, “We”, “Us”) is committed to respecting your right to privacy and protecting your Personal Information.

As agents of the Bodies Corporate we manage, we are bound by the Privacy Act 1988 (Cth) and the Information Privacy Act 2009 (QLD). This Policy applies to all your dealings with us, whether in person, or via telephone, email, correspondence or our website.

Further information on the Act and Privacy Principles can be obtained from the website of the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/privacy-law/>.

Personal Information and Collection

Personal Information means information or an opinion about an individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Examples of Personal Information that TCM collect can include names, addresses, email addresses, phone and facsimile numbers, and bank account details where direct debit facilities are offered.

This Personal Information is obtained by way of forms, correspondence, telephone, email, via our website www.tcmstrata.com, media and publications, other publicly available sources, and from third parties.

TCM collect your Personal Information for the primary purpose of delivering contracted management services to you and your Body Corporate, providing information to our clients and for marketing. We do not collect personal information unless it is reasonably necessary for, or directly related to, one or more of the services we provide or functions we carry out.

Personal information provided to TCM may be shared with its related companies. We will take all reasonable and practical measures to keep such information strictly confidential.

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.

TCM do not collect or use sensitive information about its clients.

Marketing

We may use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

TCM may use or disclose your personal information to let you know about products and services in which you may be interested. You can contact us at any time if you no longer wish us to market our products and services to you, or wish to unsubscribe from our mailing lists.

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 a case, we will take reasonable steps to ensure that you are made aware of and can confirm the information provided to us by the third party.

Internet Security

TCM takes care to ensure that the information you provide to us via our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption in relation to online forms and submissions.

You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

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.

Security of Personal Information

TCM is committed to keeping your personal information secure and safe. Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. Your personal information is stored in hard copy documents and electronically.

When your Personal Information is no longer needed or the contractual arrangements between TCM and your Body Corporate cease, 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.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access or confirm your Personal Information, please contact us in writing.

To protect your Personal Information, we will require identification from you before releasing or updating the information.

Under the Act, we may refuse to grant access to personal information if:

- We believe that granting access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety.
- Granting access would have an unreasonable impact upon the privacy of other individuals.
- Denial of access is required or authorised by law or by a Court or Tribunal order.
- Giving access would be unlawful.
- The request for access is frivolous or vexatious.
- Legal proceedings are underway or anticipated and the information would not be accessible by way of the discovery process in those proceedings.
- Giving access would reveal our intentions in relation to negotiations between us and you in such a way as to prejudice those negotiations.
- Giving access is likely to prejudice enforcement related activities conducted by, or on behalf of, an enforcement body.
- Giving access is likely to prejudice action being taken or to be taken with respect to suspected unlawful activity or serious misconduct relating to our functions or activities.
- Giving access would reveal information in connection with a commercially sensitive decision making process.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date.

If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy Updates

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

A current contractual arrangement between TCM and your Body Corporate, resulting in the continued use of our services, will be deemed acceptance of any amended Policy.

Privacy Policy Complaints and Enquiries

If you consider that there has been a breach of our Privacy Policy or relevant privacy legislation, you are entitled to complain to TCM via the appointed Privacy Officer (*details below*).

We will acknowledge receipt of a complaint within 2 business days. We will investigate the complaint and attempt to resolve it within 20 business days after the complaint was received.

If you consider that we have not adequately dealt with a complaint, you may contact the Office of the Australian Information Commissioner on the below details:

Mail: Officer of the Australian Information Commissioner (OAIC)
GPO Box 5218
SYDNEY NSW 2001

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

If you have any further enquiries about our Privacy Policy, please contact our appointed Privacy Officer:

Kelly Roberts
Managing Director
TCMStrata
kelly@tcmstrata.com