

StrataVote Privacy Policy

15.09.2020



This privacy policy describes how StrataVote (Stratasaurus Pty Ltd ACN 626 393 379) ("StrataVote", "our", "we" or "us") collects personal information via websites, applications and services ("IT Services") and how StrataVote uses such information. By using our IT Services, you agree to the collection and use of personal information in accordance with this policy.

StrataVote will endeavour to comply with the *Privacy Act (1988)* (Cth) and the *Australian Privacy Principles* ("APPs") with regards to the collection, storage and use of personal information at all times.

StrataVote will review and modify this policy from time to time. The most up to date version of this policy will be published on our website stratavote.com with the applicable revision date, or a copy can be obtained on request. We may also supplement this privacy policy with additional privacy terms or notices for our various IT Services.

This privacy policy does not apply to third-party websites, applications or services, including where we provide a link to access such websites, applications or services. We recommend you review the third-party's privacy policy before using the third-party service.

Collection

We may collect personal information in the following ways:

- directly from you;
- through your input of personal information into our IT Services;
- automatically through your use of our IT Services;
- where we collect sample or diagnostic data for the purposes of testing and supporting our IT Services, and that data contains personal information; and
- through third parties where, as part of our business service arrangement, they provide personal information about you either directly or indirectly by allowing us access to such information.

Automatic collection through use of our IT Services

We may automatically collect personal information when you use our IT Services, using analytic advertising tools (StrataVote primarily uses Google Analytics), cookies, log files, web beacons or similar technologies. These technologies collect data about:

- your use of our IT Services including information about your communications and interactions with our IT Services;
- your website browsing activities and interests (i.e. websites visited, advertising viewed and interacted with and web search terms you have entered);
- names, email addresses, phone numbers and addresses;
- internet protocol addresses and details of your internet service provider;
- your location;
- the web browser, operating system and device you use;
- your screen resolution; and
- any other information reported by your browser or third-party cookies.

As a general rule, these technologies only provide us with aggregated data, and it is not possible for us to personally identify you. We use this data to analyse trends, view patterns of use of our IT Services, gather demographic information about our user base, customise our IT Services experience for users, and display and manage personalised or interest-based marketing and advertising on our IT Services and on third-party websites.

You can control the use of such technologies, usually through your browser and device privacy settings. However, doing so may limit your use of certain features of our IT Services.

If you do not want your information used to produce personalised or interest-based advertising for you, you may opt-out of Google Analytics by installing an 'Opt-out Browser Add-on' via tools.google.com/dlpage/gaoptout/. You can opt-out of most social media personalised or interest-based advertising via your social media account settings. Third-party websites, such as youronlinechoices.com and youradchoices.com, may also provide guidance and opt-out options for various interest-based advertising service providers.

Please note that opt-outs may be reliant on your browser settings being configured correctly and do not prevent generic advertising being displayed on our IT Services or third-party websites.

Third party information

We may collect personal information about third parties from you in the following ways:

- directly from you;
- through your input of personal information of a third-party into our IT Services;
- where we collect sample or diagnostic data for the purposes of testing and supporting our IT Services, and that data contains personal information of a third-party.

You are responsible for complying with your obligations under the *Privacy Act (1988)* (Cth) and the APPs, including notifying third parties if required under the APPs.

You warrant that you will obtain consent from any such third parties before providing us (either directly or indirectly by allowing access) with any third-party information. This consent must allow us to use the personal information of the third-party in accordance with this policy.

You must notify us if you become aware that any third-party information, which you have provided to us, becomes out of date, is inaccurate or incomplete, or if that party withdraws its consent for their information to be accessed or used by either you or us.

You must also notify us if any personal information you provide (including third-party information) constitutes sensitive or medical information under the APPs, relates to children, or if the disclosure of such information as a result of a data breach might cause serious harm. You must work with StrataVote to ensure that any additional security procedures or de-identification required are properly implemented.

Using and accessing information

We primarily use and access personal information to carry out our business services for our customers.

We additionally use and access personal information to respond to complaints or enquiries and to investigate possible breaches of our terms and conditions or other agreements we have with you. We may also maintain records which contain personal information for risk management and compliance purposes.

We may also use and access information to better understand your needs, improve our products and services and market our products and services to you.

Sharing or disclosing information

We may disclose personal information:

- to our associated entities, contractors, services providers or other third parties who assist in providing our business services;
- to credit reporting agencies where clients seek payment terms or fail to pay for products or services;
- to our professional and legal advisers; and
- to courts, tribunals, regulatory authorities, or law enforcement officers as required by law or in connection with any legal proceedings including prospective legal proceedings.

By providing us with personal information, you consent to this disclosure.

Data analytics and research

From time-to-time, we carry out research and data analysis activities from data collected through our IT Services. In some instances, we may also use third-party data in conjunction with data collected through our IT Services to provide potential data linking and integration insights. Alternatively, we may provide data collected through our IT Services to third parties to carry out such activities. Any data provided to third parties will be de-identified and will usually be in aggregate form.

We carry out these activities to provide statistics and insights about the demographics and outcomes of the use of our system, including on topics relevant to the strata industry, real estate and housing, and the management and running of meetings.

We may publish or sell any results produced from such activities, provided that any such results will contain only de-identified and aggregate data.

Before carrying out any data analysis activities or providing data to third parties, we carry out a privacy impact assessment to ensure appropriate controls and risk mitigation strategies are in place. As part of this process, we take steps to de-identify and aggregate any data which contains or incorporates personal information and put in place reasonable controls to prevent re-identification.

Transmission of data

Any information input into our IT Services may be transmitted via the internet. While our IT Services are professionally hosted and operate in a secure environment, you should be aware that there remain inherent risks associated with the transmission and exchange of information through the internet. We will take reasonable steps to preserve the security of your information but do not warrant transmissions or exchanges of your information over the internet will be secure.

Cross-border transfer of data

StrataVote primarily hosts its IT Services in Australia. However, for some of our IT Services, we utilise third-party services (such as hosting, cloud storage, email and SMS services), where the third-party's terms may allow for them to transfer or store data outside of Australia. In most instances, any cross-border transfer or storage of data is limited to temporary storage or transfers for disaster recovery purposes. On request, we can provide you with a copy of any third-party terms and details of data storage locations.

By providing us with personal information, you consent to potential cross-border transfer and storage of data where third-party services are utilised. StrataVote disclaims responsibility where a third-party service provider mishandles your personal information or causes your personal information to be transferred to or stored in an overseas jurisdiction. In the event your personal information is mishandled in an overseas jurisdiction, you may have mechanisms available to you to enforce protection of your personal information under overseas law or under the relevant third-party terms.

If you have special requirements in relation to cross-border transfers or storage locations, you must notify us and work with us to put in place measures to support this (i.e. by restricting use of a third-party service, subscribing to a new or specialised third-party service). StrataVote may charge a fee to implement such measures.

Security

We have procedures in place to ensure that personal information is safeguarded and to help prevent any misuse, unauthorised access, interference, loss or disclosure. These procedures include suitable physical, electronic and managerial procedures such as encrypting data during transfer and limitations on access to personal information within our organisation. While we will take reasonable steps to keep all personal information secure, it is impossible to guarantee the absolute safety of data against a determined attacker or malicious insider, and we do not warrant the absolute safety of data in such circumstances.

Notification of eligible data breaches scheme

StrataVote strives to comply with its obligations under the notification of eligible data breaches scheme under Part IIIC of the *Privacy Act (1988)* (Cth). We have a data breach response plan, which we can provide to you on request.

If you have reason to believe personal information we hold has been subject to a data breach, please notify us immediately, by phone or email:

Call: 1300 294 674
Email: privacy@stratavote.com

Requests about your information

We will endeavour to ensure that any personal information that we collect is accurate. You should contact us if you believe the personal information we hold needs to be updated or corrected.

Where StrataVote holds personal information about you, the APPs allow you to get access to and correct the personal information we hold about you in certain circumstances. If you would like to obtain such access, please contact us. We will comply with the APPs in regards to processing such a request. We may charge a fee to recover any reasonable costs associated with providing you access to the requested information.

Where StrataVote has not directly collected information from you, you may request that we disclose where we obtained personal information about you.

How to contact us about privacy

We recommend you read the details of this policy and get in contact with us if you have any questions.

If you have an enquiry, request or complaint about this policy or your information, you may contact us as follows:

Mail: StrataVote
Level 2, 44 Currie Street
Adelaide SA 5000
Call: 1300 294 674
Email: privacy@stratavote.com

If you are not satisfied with our response to a complaint, you may wish to refer the matter to the Australian Information Commissioner as follows:

Mail: Director of Complaints
Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Call: 1300 363 992
Fax: 02 9284 966
Email: enquiries@oaic.gov.au

