

GMG Management Services Privacy Policy

Introduction

GMG Management Services Pty Ltd ACN 167 739 237 / ABN 45 536 943 212 respects your right to privacy, abides by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) [APPs] and is committed to protecting the privacy of individuals who deal with us.

This privacy policy tells you how we manage your Personal Information that we collect and hold for you. In this policy we seek to outline any concerns you may have about how we handle your Personal Information by clearly setting out:

- Types of Personal Information we collect from you
- How we collect and hold it
- How we use and disclose it
- How we keep it secure
- How you may access and correct it
- How we will deal with a privacy complaint you make
- How you can contact us

This Privacy Policy applies to GMG Management Services but not to other organisations or websites to which we are linked. It covers Personal Information collected, held, used and disclosed by GMG Management Services in relation to:

- prospective or actual Owners (Owners Corporation formerly Body Corporate)
- prospective or actual Agents and their staff
- visitors to our website
- our suppliers/independent contractors

Types of personal information we collect from you

First let us explain for you the meaning of Personal Information as it is used in this privacy policy.

Personal Information as it is used in this privacy policy and as defined in s 6(1) of the Privacy Act 1988 (Cth) means:

Information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or an opinion.

Another important category of Personal Information in the Privacy Act is sensitive information. Sensitive Information is a subset of Personal Information, where more strict rules are imposed [usually requiring consent of the individual to use their sensitive Personal Information]. The Privacy Act defines Sensitive Information as:

- information or an opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; sexual preferences or practices; or criminal record - that is also Personal Information; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification, and biometric templates.

The types of Personal Information we may collect from you will depend on the services you wish us to provide to you, or alternatively the services you offer or provide to us. Personal Information that is generally collected will be your name and contact details (home telephone/mobile phone numbers, fax, email and postal address). Where required for a stated purpose we may ask for your date of birth, gender and occupation.

Please note that sensitive information will only be collected with your express permission, and we will only use it for the purpose for which you provided it.

What and how we collect your personal information

We will generally collect Personal Information from you in person, over the phone, from an enquiry you make from our website or a third party website or from an email you send to us.

We don't collect your Personal Information unless we need it for any of our stated purposes or otherwise where we first obtain your consent.

In some circumstances, you may choose not to give us your Personal Information or to deal with us anonymously or using a pseudonym. However, this may mean that we are unable to carry out the services requested by you.

How we use and disclose your personal information

For prospective and actual owners

We use your Personal Information to communicate with you during the decision making of a new appointment of an Owners Corporation Manager. We may use it to engage service providers to assist you to maintain the common areas, where these people need to contact you or gain access to your property. Your personal details are not used or given to third parties without your consent.

For prospective or actual suppliers/independent contractors

We will use your Personal Information that you provide to us to enable you to deliver your services to us/our clients. Your acceptance of a supply or service work order will constitute your express consent to our use of your Personal Information for these purposes.

Direct marketing

Once we have your Personal Information in our database we may contact you from time to time by post, telephone, email, sms, online or via apps for ongoing marketing, or to advise you of other related opportunities that we or a related company can offer to you. You will be given the option to opt-out of any such future approaches and to remove your personal details from our database. You can do this at any time by emailing our Privacy Officer and asking to be removed from the mailing list. Alternatively, you can mail or hand-deliver a written request asking to be removed. Contact details are set out below. There is no fee for doing this.

Website privacy

We operate our website found at www.gmgmanagement.com.au (our website). Our website may record information collected when you visit our website. The information recorded may include the date and time of your visit, the pages accessed, any information downloaded, and any information and details that you enter for the purpose of contacting us for any reason. We may use information collected via our website for statistical, reporting and website administration and maintenance purposes.

Our website may use 'cookies' to help personalise your online experience. You have the ability to accept or decline cookies. If you choose to decline cookies, you may not be able to fully experience the features of our website.

We use Google Analytics to collect a range of information about your interactions with our website. Google Analytics collects the information using a number of techniques including cookies and Java Script. We use this information to evaluate the effectiveness of our website. Information about how Google handles Personal Information is available at <http://www.google.com.au/intl/en/policies/privacy/>. You can opt out of the collection of information via Google Analytics by downloading the Google Analytics Opt-out Browser Add-on.

Social media

We participate in social media such as Twitter, Facebook and our website blog. If we think it is relevant to the quality of service that we provide, we may record the essence of any topic discussed by a particular individual and their name and may contact them. Social media services also handle your Personal Information for their own purposes. These sites have their own privacy policies.

How we keep your personal information secure

Keeping secure our client and other stakeholders' Personal Information is fundamental tenet of our business. We take and will continue to take active measures to ensure your Personal Information that we hold is kept secure and to actively consider whether we are able to retain or should securely dispose of Personal Information.

We will take reasonable steps to protect Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We will securely destroy or de-identify the Personal Information we hold once the information is no longer needed for any purpose for which the information may be used or disclosed under the Australian Privacy Act. An exception is where information must be retained by law or a court/tribunal order.

We will retain your contact details in our client relationship management database, until you ask us to remove them or we are required by law to do so.

We have taken appropriate security safeguards and measures to protect Personal Information, which has included taking steps and implementing strategies to manage: governance; ICT security; data breaches; physical security; personnel security and training, relevant workplace policies; careful handling of Personal Information throughout its life cycle, regular monitoring and review of security systems.

While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information. You can help us to keep your information secure. Please remember that any user name or password in relation to our website is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

How you may access or correct your personal information

If you ask us, we will usually give you access to the Personal Information we hold about you. We will need to confirm your identity before giving you access to your Personal Information.

There are some circumstances under the APPs where we may not give you access to your Personal Information. For example, we can't give you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety.

There is generally no cost for accessing or correcting your Personal Information, unless the request is complex or resource intensive. If there is a charge, it will be reasonable and we will let you know what it is going to be so that you can agree to it before we go ahead.

Requests for access or correction should be forwarded to our Privacy Officer using any of the methods set out below. We will ensure that all requests for access or correction are considered and determined within 30 days of receipt.

By phone: 0401 401 058
By email: admin@gmgmanagement.com.au
By post: The Privacy Officer – 'Confidential'
GMG Management Services Pty Ltd
PO Box 258, Chelsea Vic 3196

How we will deal with any privacy complaint you make

How do I make a privacy complaint?

You may complain about a breach of the Australian Privacy Principles [APPs] by submitting your complaint in writing to our **Privacy Officer** .

Please consider the following before making a complaint:

- We can only consider complaints made about a person's Personal Information from the person themselves (or an authorised representative of that person).
- Any complaint should set out in as much detail as possible, all the relevant particulars relating to the complaint, including why the individual says that we have breached the APPs
- Any information collected on the Privacy Complaint Form may be used or disclosed for the purposes of the investigation process but only if it is relevant to the complaint.

How will my complaint be handled?

Our Privacy Officer will consider all complaints objectively in line with our Privacy Complaint Procedure and will:

- acknowledge receipt of your Complaint Form in writing within 7 days of receipt;
- Conduct an initial assessment of your complaint;
- Appoint an investigating officer [not connected to the complaint] to conduct an investigation into your complaint;
- Undertake an investigation;
- Make a determination as to whether a breach of the Privacy Act has occurred;
- Consider a remedy or action to be taken; and
- Communicate the decision to the person making the complaint within 30 days of receiving the complaint (where possible). If the matter is more complex and it is reasonable that we require further time to complete the investigation we will notify you of the estimated completion time in writing.

Changes to our privacy policy

From time to time we may decide to amend or update our Privacy Policy. Changes will be posted on our website. We encourage you to periodically review our Privacy Policy so that you remain informed as to how we are protecting your Personal Information.

Our contact details

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