



STRATA PRIVACY POLICY

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Version	Date	Details	By
1.0	January 2025	Created	Izzy Thompson (HR)

1. Purpose and Application

- 1.1. This policy intends to outline how Strata Title Administration Ltd (“the Company”) ensures compliance with the New Zealand Privacy Act 2020 (“the Act”) when dealing with personal information. It outlines how the Company collects, stores, uses, and discloses personal information of individuals. It is designed to ensure transparency regarding data collection practices while also adhering to relevant legislation and best practices regarding how personal information is handled.
- 1.2. This policy does not limit or exclude any of your rights under the Act. Further information regarding privacy and the Act can be found on www.privacy.org.nz.
- 1.3. With the introduction of this policy, the Company sets the following conditions:
 - This policy will be subject to updates and amendments from time to time at the sole discretion of the Company.

2. Collection of Personal Information

- 2.1. We collect personal information about you from:
 - **You**, when you provide that personal information to us, including via our website, owners portal and any related service, through any registration or subscription process, through any contact with us (e.g. telephone and email), or when you use our services.
 - **Third parties**, where you have authorised this or the information is publicly available.
- 2.2. Where possible, we will collect personal information from you directly.

3. How Personal Information is Used

- 3.1. We will use your personal information:
 - To verify your identity;
 - To provide services to you;
 - To market our services to you, including contacting you electronically (e.g. by text or email for this purpose);
 - To improve the service that we provide to you;
 - To bill you and to collect money that you owe us, or the parties that we act as agent for;
 - To respond to communications from you, including complaints;
 - To conduct research and statistical analysis;
 - To protect and/or enforce our legal rights and interests, including defending any claim;
 - For any other purpose authorised by you or the Act.

4. Disclosure of Personal Information

- 4.1. We may disclose your personal information to:



- Any business that supports our services and products, including any person that hosts or maintains any underlying IT system or data centre that we use to provide the website or other services and products;
 - A person who can require us to supply your personal information (e.g. a regulatory authority);
 - Any other person authorised by the Act or another law (e.g. law enforcement agency);
 - Any other person authorised by you.
- 4.2. We may transfer your information in the case of a sale, merger, consolidation, liquidation, reorganisation, or acquisition.

5. Protecting Your Personal Information

- 5.1. We will take reasonable steps to keep your personal information safe from loss, unauthorised activity, or other misuse.
- 5.2. The Company has a Privacy Officer who is responsible for the containment and investigation of potential privacy breaches, including notifying the individuals affected and the Office of the Privacy Commissioner where serious breaches have been found to have occurred. They are also responsible for making recommendations for improvement following a breach or potential breach.
- 5.3. The Company's employees undergo annual privacy awareness training and are regularly reminded of the importance of spotting privacy breaches early.
- 5.4. The Company operates a Privacy Breach Management Plan to ensure that all breaches are recognised and managed properly. All breaches are recorded in the Privacy Incident Register, which the Privacy Officer uses to track resolution and ensure all key steps and relevant notifications are actioned.

6. Accessing & Correcting Your Personal Information

- 6.1. Subject to certain grounds for refusal as set out in the Act, you have the right to access your readily retrievable personal information that we hold and to request a correction to your personal information. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal information related.
- 6.2. Regarding request for corrections, if we think the correction is reasonable and we are reasonably able to change the personal information, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal information that you requested a correction.
- 6.3. If you want to exercise either of the above rights, email us at bc@stratatitle.co.nz. Your email should provide evidence of who you are and set out the details of your request (e.g. the personal information, or the correction, that you are requesting).
- 6.4. We may charge you our reasonable costs of providing to you copies of your personal information or correcting that information.



7. Internet Use

- 7.1. While the Company takes reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk.
- 7.2. If you follow a link on our website to another site, the owner of that site will have its own privacy policy relating to your personal information. We suggest you review that site's privacy policy before you provide personal information.

CONTACTING US

If you have any questions about this privacy policy, our privacy practices, or if you would like to request access to, or correction of, your personal information, you can contact us at bc@stratatitle.co.nz.