SILVER
ASSET SERVICES

POLICY

Privacy Statement

How Silver Asset Services collects, uses, protects and gives you access to your personal information.

EFFECTIVE 1 JULY 2002 · UPDATED 23 MARCH 2021

It is important that you are confident that any personal information you provide to us is treated with the highest degree of integrity and privacy.

Our Privacy Policy recognises your right to privacy. We understand that any personal information we may collect about you will only be used for the purposes set out in our policy to enable us to provide you with the best possible service from Silver Asset Services.

This document sets out our privacy policy commitment in respect of personal information that is received from you or on your behalf.

What is your personal information?

Personal information is any information about you that identifies you or by which your identity is apparent or can be reasonably determined. This information may include information or an opinion about you from a third party.

Silver Asset Services will only collect Personal Information in circumstances where:

- It is reasonably necessary for Silver Asset Services to provide services or functions we carry out; and
- You consent to the collection of the information; or
- We are required or authorised by law to collect the Personal Information.

How do we collect personal information?

Where practical we will collect your personal information directly from you, such as when we receive your Get Connected Application Form.

Sometimes Silver Asset Services will collect Personal Information from a third party or a publicly available source where available and lawful.

If we receive personal information that we did not solicit, we will determine as soon as reasonably practicable whether we could have lawfully collected that information as part of our functions or activities. If we are not satisfied that we could have lawfully collected the information, then we will (if it is lawful and reasonable) destroy the information or ensure that it is de-identified.

When you visit our website, our website may store “cookies” which record details of your server address and your usage of our website such as what pages you view. We use “cookies” only for internal management purposes and do not use them to collect personal information.

If you do not wish us to use “cookies” you can set your browser so that it will not accept them, however you should ensure that this will not affect your ability to view other websites.

Using your personal information

From time to time, we may use your personal information to provide you with marketing information about our range of products, changes to our organisation, new products or other services being offered by us or any organisation we are associated with. Our usual method of contact will be by email; however, we may also telephone, fax or mail you in certain cases.

If you do not wish to receive any marketing information you may decline to receive such information by contacting our offices by telephoning **1300 972 702** or by email at **customerservice@silverasset.com.au**.

We will take all reasonable steps to meet your request at the earliest possible opportunity.

Once you have told us you no longer wish to receive information about our products and services, we will not send you any further material, unless we are required by law to send such information to you.

Unless you have specifically agreed to our doing so, we will not disclose your personal information to a non-associated party for the purposes of allowing them to direct market their products or services to you.

Disclosing your personal information

Any personal information collected by Silver Asset Services will only be used and disclosed for the purpose for which it has been provided to us or as authorised under law. We may disclose personal information that we collect about you to other organisations which provide products or services used or marketed by us. These include contractors, mail service providers and associated companies in our group.

We may also disclose your personal information to others if required or authorised by law or when you have consented to us doing so. If you advise us that you do not wish to have your personal information used or disclosed for a particular purpose, we shall respect your wishes, unless this is not legally or practically possible.

Where possible we will advise you at or before the time of collecting your personal information of the organisations we intend to disclose the information to. Your consent to the disclosure of your personal information may be given in writing or verbally or may be implied from your conduct.

If you are dealing with another organisation referred to you or contracted by us to provide a service to you, we may be required to pass personal information back to that organisation during the provision of their services. We will take all reasonable steps to satisfy ourselves that each organisation has a commitment to protecting your personal information at least equal to our Privacy Policy.

Social media

We will not publish or report on conversations or information received by way of social media that is deemed confidential or classified or discloses any personal information.

Updating your personal information

We collect and receive personal information to enable us to conduct our business and provide services to our customers. If the personal information you provide to us is inaccurate or has changed and we have not been notified, we may be unable to provide you with these services.

By collecting personal information, we:

- arrange and administer these services and products.
- determine your requirements and services you may require from us.
- can update and improve our services to you.
- maintain your records and protect you from unauthorised access to your personal information.

Safety and security of your personal information

The safety and security of your personal information is a priority for us. We will take all reasonable precautions to protect your personal information from loss, misuse, unauthorised access, modification, or disclosure by storing it in a secure environment and allowing access only to authorised persons. When your personal information is no longer required for the purpose for which it was used or disclosed it will be destroyed or permanently de-identified unless it is required to be kept by law.

When using our website, you acknowledge that no data transmission over the Internet is 100% secure and that we cannot guarantee the security of any information you transmit to us over the Internet. Once we receive your transmission, we will take all reasonable steps to ensure its security.

Access to your personal information

You may request access to any of the personal information we hold about you at any time. To make a request for access to your personal information, please contact our Privacy Officer (contact details below). If you are aware that we hold personal information about you that is no longer accurate, complete or up-to-date, please contact us.

We will endeavour to respond to your request within 14 days unless the information you seek is not readily available, for example, archived data, in which case we will advise you of the time we estimate will be required to retrieve the information.

If personal information is provided to you as a result of a request, we reserve the right to charge you a fee for costs incurred in retrieving and providing that information such as photocopying, administration and postage.

We are not always required to provide you with access to your personal information upon your request.

Access to your personal information may be denied where providing access:

- will pose an unreasonable impact on the privacy of another individual
- would pose a threat to the life, health, or safety of an individual or to public health or public safety
- may prejudice an investigation or relate to an existing or anticipated legal proceeding with you
- is authorised to be denied by law or by an Order of a Court or Tribunal
- is regarded as frivolous or vexatious
- is unlawful
- is likely to prejudice enforcement related activities conducted by, or on behalf of, a law enforcement body
- is likely to prejudice action being taken or to be taken with respect to suspected unlawful activity or serious misconduct
- would reveal information in connection with a commercially sensitive decision-making process.

If access is denied, we will provide you with reasons for our decision.

Do you have to be identified?

In most cases it will not be possible for us to provide our services to you unless we have identified you. Wherever it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously, if you request it.

Passing personal information on outside Australia

We do not send personal information outside Australia unless we are authorised to do so by you or the law.

Collecting sensitive information

We will not collect, use or disclose sensitive information except with your specific consent or in circumstances required by law or permitted by the Australian Privacy Principles (APPs). Sensitive information can be information about your:

- racial or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or affiliations
- philosophical beliefs
- membership of a professional or trade association
- membership of a trade union
- sexual preferences or practices
- criminal record
- health

Email

When you contact us by email this will usually involve providing your name and contact details. We will treat all personal information received by email in accordance with our Privacy Policy.

Acting in relation to debt recovery

When acting in relation to debt collection, we will often be acting on instruction of a Building Owner or the Committee for the Body Corporate/Owners Corporation. Silver Asset Services will also act in accordance with the guidelines of the Australian Competition and Consumer Commission and treat all personal information in accordance with our privacy policy.

Changes to our Privacy Policy

As we continually review policies and procedures, we may change this Privacy Policy from time to time. The varied terms will apply from the date they are made. This Privacy Policy took effect on 1 July 2002 and was updated on 23 March 2021.

If you believe there has been a breach of the APPs you are entitled to complain to us. Please direct any complaints to our Privacy Officer (contact details below). We will investigate your complaint and endeavour to resolve it.

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

> Office of the Australian Information Commissioner (OAIC)
> GPO Box 5218, Sydney NSW 2001
> Email: enquiries@oaic.gov.au

How to contact us

If you wish to lodge a request to access your personal information or have any queries or complaints in regard to our collection, use or management of your personal information you can contact us at:

> **Silver Asset Services**
> PO Box 1886, Sunnybank Hills QLD 4109
> Telephone: 1300 972 702
> Email: customerservice@silverasset.com.au