

The MaxSoft Group Privacy Policy

Covering the following brands:



MaxSoft Group (the **Group**) is firmly committed to protecting your privacy while interacting with our content, products and services. We aim to provide you with a secure and convenient service while at the same time allowing you to control your privacy and to give you a means to voice any questions or concerns you may have.

For this reason, we ensure that your information is handled in strict compliance with the Commonwealth Government's Australian Privacy Principles set out in the Privacy Act 1988. Further information on Australian Privacy law is available from the Office of the Australian Information Commissioner (www.oaic.gov.au).

The purpose of this Privacy Policy is to tell you what kind of information we may gather or hold about you, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of, and your ability to correct this information.

This Privacy Policy covers:

- a) Members of the Group
- b) Collection of Personal Information
- c) Use of Personal Information
- d) Disclosure of Personal Information
- e) Data Quality
- f) Storage and data security
- g) Access and correction
- h) Identifiers
- i) Complaint resolution mechanisms
- j) Application and amendments to this Privacy Policy

Members of the Group

The Group includes MaxSoft Pty Ltd (**MaxSoft**) and its related bodies corporate. Following is a list of the members of the Group:

- MaxSoft Pty Ltd (ACN 089 173 231)
- StrataCash Management Pty Ltd (ACN 124 400 924)
- StrataMax Pty Ltd (ACN 096 505 949)
- TaskMax Pty Ltd (ACN 100 310 450)

- DonateMax Pty Ltd (ACN 113 093 217)
- StrataPay Pty Ltd (ACN 097 607 451)
- RentMate Pty Ltd (ACN 123 768 294)
- SmartaPay Pty Ltd (ACN 123 872 935)
- Strata Loans Pty Ltd (ACN 169 447 189)

These are the main current principal operating entities of the Group as at the date of this document. A reference in this Privacy Policy to the Group, 'we', 'us' or 'our' refers to the members of the Group.

Collection of Personal Information

"Personal Information" is information or an opinion, 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. Personal Information that we may collect and hold include (but is not limited to) the following:

- a) name;
- b) postal, residential address and/or service address;
- c) email address;
- d) date of birth;
- e) contact details including telephone numbers (landline and mobile);
- f) gender;
- g) occupation and employment details;
- h) driver licence information;
- i) passport information;
- j) medicare card information;
- k) credit/debit card information;
- l) payment details;
- m) details about body corporate ownership;
- n) ASIC corporate searches;
- o) any feedback that you give us; and
- p) information that we collect for marketing purposes, such as your areas of interest and other information you provide to us.

We require this information to provide products and services to you. In some circumstances, we are required to collect this and, at times, further information to comply with our legal obligations such the identification requirements under the Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) Act 2006.

The Group primarily collects Personal Information via third parties including billers, body corporate / strata managers, real estate agents, credit providers and general service providers who have a relationship with the Group. These third parties assist the Group in providing quality services. The Group may also collect information from ASIC or other credit reporting bodies.

The Group may collect Personal Information directly from you when you:

- a) provide the information to us by completing a form or over the phone;

- b) visit our website;
- c) use our services;
- d) request information about us, our products or our services;
- e) provide feedback;
- f) fill in a form on our website; or
- g) where we are required or authorised by law to do so.

The Group will retain identification information about all individuals with whom it deals.

Use of Personal Information

We use and hold the Personal Information we collect about you for our business functions and activities, which may include the following:

- a) to communicate with you and provide you with information, products or services you have requested;
- b) to verify the identity of the individuals and assess their credit worthiness;
- c) prepare reports, calculate levies, process and reconcile payments;
- d) deliver information to body corporate/strata managers and / or real estate agents;
- e) to establish and manage bank accounts domiciled with Bank of Queensland (or any other ADI of our choice)
- f) to establish and manage merchant facilities;
- g) to process direct debit payments or any reversals;
- h) assist customers by providing them with information and support;
- i) personalise and customise your experiences with our website;
- j) to manage and administer any account you may hold with us;
- k) to promote and market our products and services to you or provide you with information that we believe may be of interest to you;
- l) to help us research the needs of our customers and to market our products and services with a better understanding of your needs and the needs of customers generally;
- m) to conduct research for the purposes of improving existing products or services or creating new products or services;
- n) to process any job application submitted by you;
- o) to collect payments;
- p) for business support purposes including maintenance, backup and audit;
- q) to allow us to provide advertising material to you regarding us, our clients, and other business partners;
- r) share the Personal Information with our related entities, business partners and selected third parties; and
- s) to respond to any queries or complaints you may have.

You consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, telemarketing, email, SMS and MMS messages. You can contact us using the contact details specified below if you do not want to receive marketing information from us or if you want to stop receiving telemarketing.

We may collect and use your Personal Information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your Personal Information.

If you choose not to provide your Personal Information to the Group for the purposes set out in this Privacy Policy, we may not be able to undertake certain activities for you such as providing you with requested information, products or services.

Disclosure of Personal Information

Depending on the nature of your engagement with us, we may disclose your Personal Information to the members of the Group, our other related entities and to third parties that provide products and services to us or through us such as your body corporate/strata manager and real estate agents. We may also disclose information to Government bodies and other law enforcement agencies such as the Police and / or Centrelink.

We may disclose your Personal Information to our financial partners including the National Australia Bank and the Bank of Queensland.

We may disclose your Personal Information to our external service providers such as mailing houses who distribute information to you on our behalf or market researchers who have been commissioned by the Group to carry out surveys and research.

We may also disclose your Personal Information to our website host or software application providers in certain limited circumstances, for example when our website experiences a technical problem or to ensure that it operates in an effective and secure manner.

We do not otherwise disclose your Personal Information without your permission, unless the disclosure is:

- a. in accordance with this Privacy Policy or any agreement you enter into with us;
- b. required or authorised by law, including without limitation the Australian Privacy Principles;
- c. required to meet our AML/CTF related obligations with AUSTRAC or any other party; or
- d. made with your consent.

We use third party software applications which are likely to store your Personal Information in data centres that may be located overseas and we will take reasonable steps to ensure that any overseas recipients the information not breach the Australian Privacy Principles.

Data Quality

The Group will take reasonable steps to make sure that the Personal Information it collects, uses or discloses is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete. Please contact us in any of the ways specified below if you believe that your Personal Information is inaccurate or incomplete, and we will use all reasonable efforts to correct the information.

Storage and Data Security

The Group will take reasonable steps to protect the Personal Information it holds about you from misuse and loss and from unauthorised access, modification or disclosure. The Group maintains strict standards and security procedures to prevent unauthorised access to the Personal Information whether it is in an electronic or paper format, and to ensure the correct use of this information. Personal Information is stored in a central database that is password protected with access available only to authorised persons (such as employees of the Group or our external database administrator) or otherwise your Personal Information is securely held within the Group's offices and only available to authorised persons.

If you have been provided with a secure logon identity and password to access the Group's website, it is very important that you keep the logon identity and password secure and make every effort to ensure that they are not misused, lost or stolen. You must tell us immediately if you become aware of or suspect that your logon identity or password has been compromised in any way that impacts or may impact access to the Group's website. The Group cannot be held responsible if you disclose the logon identity or password to anyone else.

The Group will take reasonable steps to destroy or permanently de-identify the Personal Information if it is no longer needed for any purpose.

Access and Correction

You are entitled to access the Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal. We may charge a reasonable fee for providing you with access to that Personal Information.

A request for access can be made by contacting our Privacy Officer. Our Privacy Officer contact details are at provided at the end of this document.

If you establish that the Personal Information we hold about you is not accurate, complete and up to date, the Group will take reasonable steps to correct the information so that it is accurate, complete and up to date. If reasonable steps to correct the information cannot be taken by the Group where such correction of the Personal Information is not technically possible or would be impracticable for the Group to perform, the Group may be unable to continue to provide services to you. The Group will provide reasons for denial correction.

The Group may also update the Personal Information it holds about you if instructed to do so by certain third parties that originally provided us that information. These entities include body corporate/strata managers or real estate agents. The Group may also provide access to the Personal Information to such third parties.

Identifiers

The Group will not adopt as its own identifier an identifier that has been assigned by a government agency (or by an agent of, or contractor to, a government agency acting in its capacity as agent or contractor).

The Group will not use or disclose an identifier assigned to you by a government agency (or by an agent of, or contractor to, a government agency acting in its capacity as agent or contractor) except where such use or disclosure is expressly provided for in this policy.

Complaint Resolution Mechanism

If you have a question, concern or complaint regarding the way in which we handle your Personal Information, you should contact our Privacy Officer.

The Group takes a best practice approach to addressing privacy complaints. We will issue you with a timely response to any complaint that, if appropriate, will outline the measures that the Group will take to resolve the complaint.

If you feel that we have not satisfactorily addressed your complaint, you may also make a complaint to the Office of the Australian Information Commissioner by visiting www.oaic.gov.au or by writing to GPO Box 5218 Sydney NSW 2001.

Application and Amendments to this Privacy Policy

The Group will take reasonable steps to let you know, generally, what sort of Personal Information it holds, for what purposes, and how it collects, uses, and discloses that information. If you have any queries about this policy, or the manner in which the Group applies this Privacy Protection Policy to your Personal Information please contact our Privacy Officer. Our Privacy Officer contact details are at provided at the end of this document.

The Group is constantly improving and enhancing its services to clients, and may update this privacy policy from time to time. Any changes to the policy will be advised to you by updating this page on the website of the Group's members.

If you have any comments or suggestions regarding this privacy policy or if you have any concerns about what information we have about you or how we store it please contact the Group's Privacy Officer on the details provided above.

Privacy Officer Contact Details

You may contact our Privacy Officer in any of the following ways.

Post: PO Box 7110
Gold Coast MC QLD 9726
Telephone: 1800 65 63 68
Email: privacy@maxsoft.com.au