Privacy Policy – Hallmark & Stone (Asset Management)

Effective Date: 22 July 2025

Hallmark & Stone Limited ("we", "us", "our") provides body corporate and facilities management services and is committed to protecting the privacy of all individuals whose personal information we handle — including unit owners, committee members, tenants, contractors, and service providers.

This policy outlines how we collect, use, store, disclose and protect personal information in line with the Privacy Act 2020 and relevant requirements under the Unit Titles Act 2010.

1. What Personal Information We Collect

We collect personal information necessary for the effective management of the body corporate. This may include:

- Owner and resident details: Name, address, contact information, and unit ownership records
- Committee information: Names and contact details of elected members
- Maintenance and contractor records: Notes of service requests, contractor access, and job history
- Financial details: Bank account numbers for levy payments or refunds, levy payment history, insurance claims
- Correspondence and documentation: Emails, meeting minutes, AGM/EGM participation records, and service request logs
- Portal and website use: Login history, IP address, and preferences if using our online systems

## 2. How We Collect Information

We may collect your information:

- Directly from you (e.g. via email, phone, forms, or online portal)
- From the chairperson, committee, developer, or prior management companies during transitions
- From service providers engaged for maintenance or compliance purposes
- Automatically, through our systems when you interact with our digital tools

### 3. Why We Collect and Use Your Information

We use your information to:

- Manage the administration of the body corporate (e.g. levies, meetings, communication)
- Respond to gueries and maintenance requests
- Ensure compliance with the Unit Titles Act 2010 and other relevant legislation
- Communicate building matters, project updates, and meeting information
- Coordinate access with tradespeople and contractors
- Maintain financial records and issue levy invoices or notices
- Facilitate online portal access and updates

## 4. Privacy and the Unit Titles Act 2010

Under section 206 of the **Unit Titles Act 2010**, the body corporate is required to maintain a register of unit owners and their contact details. This register must be made available to any unit owner or their authorised agent upon request.

We manage this process on behalf of the body corporate and take reasonable steps to ensure that access to such information is limited to authorised parties and used solely for purposes permitted under the Act. This includes purposes such as issuing notices, holding meetings, and carrying out maintenance or repairs.

If you request a copy of the register or any other records, we may ask for verification of your identity and your entitlement to access the information.

### 5. Disclosure of Your Information

We only disclose your information when necessary and for the purposes outlined above. This may include disclosure to:

- Committee members (where relevant to their role)
- Body corporate service providers (e.g. insurers, tradespeople, auditors)
- Regulatory or legal authorities, if required by law
- Our technology and cloud service partners, to support our systems and operations
- Incoming body corporate managers during a change in management, as part of the transition process

All third parties are required to protect your information in line with the **Privacy Act 2020**.

### 6. Storage and Security

We store personal information securely in electronic systems hosted in New Zealand or countries with comparable privacy safeguards. We use access controls, secure passwords, and staff training to protect your information.

Information is retained only for as long as necessary to meet legal and operational requirements.

### 7. Accessing and Correcting Your Information

You have the right to request:

- Access to any personal information we hold about you
- Correction of any information that is inaccurate or outdated

We aim to respond to such requests within 20 working days. Please contact us using the details at the end of this policy.

#### 8. Online Portal and Cookies

If you use our online owner portal, we may collect information about your activity to:

- Help resolve support queries
- Understand user engagement and improve our services

Our website may use cookies to enhance your experience. You can disable cookies via your browser settings, though this may impact functionality.

### 9. Data Breaches

If we experience a privacy breach that is likely to cause serious harm, we will notify the Office of the Privacy Commissioner and affected individuals, in accordance with the **Privacy Act 2020**.

We maintain an internal privacy breach register and review any incidents to improve our systems and practices.

### 10. Updates to This Policy

We may update this policy from time to time. The latest version will always be available on

our website or by request. Continued use of our services indicates acceptance of any changes.

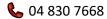
# 11. Contact Us

If you have any questions about this privacy policy or would like to exercise your privacy rights, please contact:

# **Tim Taylor**

**Privacy Officer** 

tim@hallmarkstone.co.nz



262 Thorndon Quay, Wellington 6011, New Zealand

If you are not satisfied with our response, you may lodge a complaint with the **Office of the Privacy Commissioner** at <a href="https://www.privacy.org.nz">www.privacy.org.nz</a>.