

# CROY LEGAL PRIVACY POLICY

## 1. Introduction

Croy Legal Pty Ltd (“Croy Legal”, “we”, “us” or “our”) is committed to protecting your privacy and handling your personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (“APP”) and other applicable privacy laws and regulations.

As a legal practice, we are also subject to professional confidentiality obligations and legal professional privilege.

## 2. What is Personal Information?

“Personal Information” means any information or opinion about an identified individual who is reasonably identifiable, this includes information or an opinion that personally identifies you either directly (for example your name) or indirectly.

Personal information may include: your name, signature, address, phone number, date of birth, sensitive information, credit information, employee record information, photographs, internet protocol (IP) addresses, voice print and facial recognition biometrics and location information from a mobile device.

## 3. What Personal Information We Collect

We collect personal information that is reasonably necessary to provide legal services, including:

- Contact information (name, mailing and/or street address, email address, phone number)
- Identification and contact information (passport, driver licence, date of birth, country of birth and any other information required for identity verification)
- Beneficial ownership information, source of funds information, and source of wealth information where required by law.
- Financial and business information (including income, assets and liabilities)
- Property and transaction information
- Information relating to legal matters and disputes
- Superannuation and insurance information

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- Sensitive information where required for legal services where required and permitted by law (this might include any information or opinion about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual preferences, criminal record, or health information)

If we collect your sensitive information, we will do so only with your consent, if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

If you choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

#### **4. How We Collect Personal Information**

We may collect personal information:

- Directly from you (including over the phone, at meetings, forms, email, online or in person)
- Attending an event
- From other parties involved in your legal matter
- From professionals engaged by you (e.g. accountants, advisers)
- From publicly available sources
- From related entities where authorised by you

#### **5. Purpose of Collection**

We collect, hold and use your personal information to:

- Provide legal advice and services
- Act on your behalf in legal matters
- Conducting customer due diligence, identity verification and ongoing monitoring to comply with anti-money laundering and counter-terrorism financing laws
- Communicate with you and other relevant parties
- Comply with legal and regulatory obligations

## **6. Disclosure of Personal Information**

We may disclose your personal information in accordance with this Policy in circumstances where you would reasonably expect us to disclose information and where appropriate, including to:

- Courts and tribunals
- AUSTRAC, law enforcement agencies, regulatory authorities and government bodies where required or authorised by law
- Other parties involved in your legal matter
- External service providers assisting us (IT providers, marketing providers), professional service providers)

## **7. Disclosure to Related Entities**

We will not disclose your personal information unless:

- you have provided express consent, or
- we are required or permitted to do so by law

### **Where disclosure is authorised:**

- it will be limited to what is reasonably necessary
- it will be for a specific purpose

## **8. Confidentiality and Legal Professional Privilege**

We are subject to strict duties of confidentiality.

Information you provide may be protected by legal professional privilege, and we will take all reasonable steps to maintain that protection.

You acknowledge that:

- disclosure of information to third parties may affect privilege
- we will not disclose privileged information without your authority unless required by law

## **9. Anti-Money Laundering and Counter-Terrorism Financing Obligations**

We are subject to obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and related laws.

To comply with these obligations, we may collect, verify, use and retain personal information relating to your identity, beneficial ownership, source of funds, source of wealth, business

activities and other information reasonably required to undertake customer due diligence and ongoing monitoring.

This information may be obtained directly from you or from reliable and independent sources including government registries, financial institutions, professional advisers, electronic verification providers and other third parties as permitted by law.

We may disclose personal information to AUSTRAC, law enforcement agencies, regulators and other government authorities where required or authorised by law.

In some circumstances, anti-money laundering and counter-terrorism financing laws may restrict our ability to inform you that information has been disclosed to, requested by, or reported to a government authority.

We will collect, use, retain and disclose personal information for AML/CTF purposes only as permitted or required by law.

## **10. Data Security**

We take reasonable steps to protect your personal information from misuse, interference, loss, and unauthorised access, modification or disclosure.

We will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- having a robust physical security of our premises and databases / records;
- taking measures to restrict access to only personnel who need that personal information to effectively provide services to you;
- having technological measures in place (for example, anti-virus software, fire walls).
- Staff training and regular IT security training

## **11. Overseas Disclosure and Cloud Service Providers**

We may use third-party technology platforms, cloud storage providers and software applications to operate our business and deliver services to clients.

As a result, personal information may be stored, processed or accessed by service providers located outside Australia. These locations may include countries in which our technology and service providers operate data centres or support services.

We take reasonable steps to ensure that any overseas recipients handle personal information in a manner consistent with Australian privacy laws and our obligations under the Privacy Act 1988 (Cth).

## **12. Retention of Personal Information**

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

## **13. Access and Correction**

You may request access to, or correction of, your personal information by contacting us in writing.

## **14. Complaints**

If you have concerns about how your personal information has been handled, you may contact us.

If you are not satisfied with our response, you may contact:

- the Office of the Australian Information Commissioner (OAIC)
- the Queensland Law Society (QLS)

## **15. Contact Details**

Croy Legal Practice

Megan Selbie, Privacy Officer

[megan@croylegal.com.au](mailto:megan@croylegal.com.au)

## **16. Updates**

We may update this Privacy Policy from time to time.