

COLWELL CONVEYANCING GROUP

Colwell Legal Pty Ltd ACN 657 194 833

PRIVACY POLICY

Effective 26 June 2026

Legislative Basis

This Policy is issued under:

- Privacy Act 1988 (Cth), as amended by the Privacy and Other Legislation Amendment Act 2024 (Cth)
- Australian Privacy Principles (APPs 1–13)
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), as amended by the
AML/CTF Amendment Act 2024 (Cth) — obligations commencing 1 July 2026
- AML/CTF Rules 2025 (Cth)
- Legal Profession Act [Qld] and trust accounting obligations

This Policy replaces the May 2022 Privacy Policy. It is to be read alongside the AML/CTF Privacy Collection Notice provided at client engagement (see Appendix — AML/CTF Privacy Collection Notice).

1. About This Policy

Colwell Legal Pty Ltd (ACN 657 194 833) trading as Colwell Conveyancing Group ('we', 'us', 'our') operates an Australian legal conveyancing practice from Suite 101, 53 Endeavour Boulevard, North Lakes QLD 4509. We are committed to protecting personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

From 1 July 2026 we are a reporting entity under the AML/CTF Act. We enrolled with AUSTRAC on 31 March 2026. This means we are also bound by the Privacy Act with respect to all personal information we handle for, or in connection with, our AML/CTF obligations — regardless of annual turnover. The Privacy Act's small-business exemption does not apply to our AML/CTF activities.

This Policy explains how we collect, hold, use and disclose personal information, including for AML/CTF customer due diligence (CDD) purposes, and sets out your rights in respect of that information.

It applies to: our website (www.conveyancinggroup.com.au); our social media pages; our conveyancing and legal services; and all personal information we handle for AML/CTF compliance.

This Policy should be read alongside our AML/CTF Privacy Collection Notice (Appendix), which is provided to clients and, where practicable, beneficial owners at the time of engagement.

2. Personal Information We Collect

We collect only the personal information that is reasonably necessary for the purposes set out in this Policy. We do not collect personal information beyond what is necessary.

2.1 Clients and Beneficial Owners

For individual clients, and for any beneficial owners identified through our CDD process, we may collect:

- full legal name, date of birth and residential address;
- contact information (phone number, email address);
- occupation and source of funds or wealth (for AML/CTF risk assessment);
- identity document details — the type of document, document number, expiry date and issuing country/authority; from 1 July 2026 we do not retain photocopies or scanned copies of identity documents for AML/CTF record-keeping purposes (see Section 8);
- tax file number or foreign tax identification number, where required;
- politically exposed person (PEP) status and sanctions screening results;
- financial information relevant to the transaction (e.g., purchase price, funding source, lender details, trust account receipts);
- information about the nature and purpose of the conveyancing transaction.

2.2 KYC Documents and Trust / Company Structures

Where a client is a company, trust, partnership or other legal arrangement, we collect:

- entity name, ABN/ACN, registered address and nature of business;
- constitutional documents, trust deeds, partnership agreements or equivalent instruments;
- details of directors, trustees, partners, beneficiaries and ultimate beneficial owners (UBOs);
- identity information for each natural person with significant control or beneficial ownership.

2.3 Third Parties

In the course of providing our services we may receive personal information from, or about, third parties including real estate agents, banks and lenders, mortgage brokers, accountants, financial advisers, counterparty solicitors, identity verification service providers and government bodies (e.g., Titles Queensland, ATO, AUSTRAC). Where we collect personal information about an individual from a third party, we will notify that person unless it is impracticable, inconsistent with our AML/CTF tipping-off obligations, or otherwise not required under the APPs.

2.4 Website and Digital Channels

When you visit our website we collect device and traffic data as described in the existing policy: visiting frequency, pages visited, IP address, device ID, device type and browser version. We use cookies for site functionality, analytics and marketing as set out in Section 5.4 below. This data is generally not linked to your identity unless accessed through a personalised link or where you have identified yourself.

2.5 Marketing Lists and Business Development

We may collect contact details (name, email, phone, organisation) through enquiries, referrals, professional networks and, where lawful, publicly available sources or marketing lists. We handle this information in accordance with the APPs and the Spam Act 2003 (Cth). You may opt out of marketing communications at any time.

2.6 Sensitive Information

We generally do not collect sensitive information (as defined by the Privacy Act) unless reasonably necessary for a specific purpose and we have your consent, or we are required or authorised to do so by law. We do not conduct biometric identity verification. Identity verification is performed electronically through InfoTrack, which checks document details against government and authoritative databases without collecting biometric data.

3. How We Collect Personal Information

We collect personal information:

- **Directly from you** — through engagement letters, client questionnaires, identity verification forms, meetings, correspondence, telephone calls and our website;
- **From third parties** — such as real estate agents, financial institutions, accountants, identity verification services, government registers and counterparty solicitors, where reasonably necessary and permitted by the APPs;
- **From publicly available sources** — including ASIC registers, land title records, court registers, government databases, PEP lists and sanctions lists; and
- **Automatically** — through our website and client portals (cookies, access logs) as described in Section 5.4.

We will generally collect personal information about beneficial owners or third parties from the client or other sources where it is unreasonable or not practical to collect it directly. We will notify the individual where practicable.

4. Why We Collect and Use Personal Information

4.1 Provision of Legal and Conveyancing Services

We use personal information to:

- establish and manage the client relationship, including conflict-of-interest checks;
- provide conveyancing and associated legal services including preparing and executing contracts, transfer documents, mortgage documentation and settlement;
- communicate with you, counterparties, financial institutions and government bodies;
- manage our trust account and client disbursements in accordance with trust accounting legislation;
- comply with our professional obligations and legal professional privilege;
- deliver the services you have engaged us to provide.

4.2 AML/CTF Customer Due Diligence (CDD)

As a reporting entity under the AML/CTF Act (from 1 July 2026), we are required to collect and verify personal information to:

- conduct initial CDD, including verifying the identity of clients and beneficial owners before or as soon as practicable after providing a designated service;
- assess the money laundering / terrorism financing (ML/TF) risk associated with each client and transaction;
- conduct ongoing CDD and transaction monitoring throughout the client relationship;
- screen clients and beneficial owners against PEP, sanctions and adverse media lists;
- identify and report suspicious matters to AUSTRAC (Suspicious Matter Reports) where required;
- report threshold transactions (cash transactions of AUD 10,000 or more) to AUSTRAC;
- maintain AML/CTF records as required by the AML/CTF Act and AML/CTF Rules 2025.

We collect only the personal information that is reasonably necessary to meet our AML/CTF obligations. The level and nature of information collected is proportionate to the assessed ML/TF risk of the client and the designated service.

4.3 Legal, Regulatory and Professional Obligations

We may also collect and use personal information to:

- comply with the Legal Profession Act [Qld], trust accounting rules and obligations to the Queensland Law Society / Legal Services Commissioner;
- comply with court orders, subpoenas and compulsory regulatory processes;
- manage professional indemnity insurance and risk;
- bring or defend legal proceedings.

4.4 Business Operations and Marketing

We use personal information for legitimate internal purposes including invoicing, debt recovery, file management, archiving, staff management, improving our services and, where consented to or permitted, marketing our services to clients and prospects.

5. Specific Uses of Personal Information

5.1 Financial Information

We collect financial information (e.g., transaction amounts, bank account details, lender details, settlement figures) to provide our conveyancing services and to comply with our trust accounting and AML/CTF obligations. Financial information is handled on secured systems with appropriate encryption. We share financial information only with your financial institution, the counterparty's solicitor and government bodies as required to complete the transaction.

5.2 Identity Verification

We collect identity document details for the purpose of verifying your identity in accordance with our AML/CTF obligations. Identity verification is conducted electronically through InfoTrack, which checks document details against government and authoritative databases. From 1 July 2026, we record the particulars of your identity document (type, number, expiry, issuing authority) and the verification method and outcome; we do not retain photocopies or scanned copies of identity documents collected on or after that date, unless separately required by another law. Prior collections may be retained for the applicable AML/CTF seven-year period.

5.3 Automated Decision-Making

We may use automated tools (including sanctions screening and PEP screening software) to assist with our AML/CTF compliance. Significant decisions about you are not made using purely automated means without human review. We will update this Policy when the enhanced automated decision-making disclosure obligations under the Privacy Act take effect on 10 December 2026.

5.4 Cookies and Website Analytics

We use cookies and similar technologies on our website for site functionality, visitor analytics and marketing. You may disable cookies through your browser settings, though this may affect your ability to use certain features. Cookie data is generally not linked to your identity unless you have logged in or clicked through a personalised link. We may use anonymised, aggregated analytics data for any purpose.

6. Disclosure of Personal Information

We do not sell personal information. We disclose personal information only where necessary for the purposes described in this Policy, or as required or authorised by law.

We may disclose personal information to:

- **AUSTRAC** — as required by the AML/CTF Act (e.g., Suspicious Matter Reports, Threshold Transaction Reports);
- **Law enforcement, courts and regulators** — including the Queensland Law Society, Legal Services Commissioner, ATO and relevant courts, where required by law;
- **Titles Queensland and government agencies** — to effect transfers and registrations in connection with conveyancing transactions;
- **Counterparty solicitors and their clients** — to the extent required to complete the transaction;
- **Banks, lenders and financial institutions** — in connection with settlement, mortgage discharge or establishment;
- **Accountants and financial advisers** — where acting for you in connection with the transaction;
- **Real estate agents** — involved in the property transaction;
- **AML/CTF service providers** — including InfoTrack (electronic identity verification), sanctions screening and KYC data providers engaged under appropriate data processing agreements;
- **Professional indemnity insurer and legal advisers** — in connection with claims or legal proceedings;
- **Technology and cloud providers** — see Section 7;
- **Buyers and sellers in property transactions** — to the extent required for the transaction;
- **A purchaser of our business** — in the event of a corporate restructure, merger or sale of assets;
- **Utility providers and connection services** — where you have requested such services through us.

Where we engage Suppliers (contractors or service providers) to process personal information on our behalf, we require them by contract to keep that information safe and secure and to use it only as directed by us.

6.1 AML/CTF Tipping-Off Restriction

The AML/CTF Act makes it a criminal offence to disclose information that would, or could reasonably be expected to, prejudice an AML/CTF investigation (the 'tipping-off' offence, effective 31 March 2025). This Policy and our Collection Notice therefore do not refer to all AML/CTF activities we may undertake. We are not required to notify individuals of information that falls within the scope of this restriction.

7. Overseas Disclosure of Personal Information

We use cloud-based software and services in our practice. Some of these providers store and process data on servers located outside Australia.

Before disclosing personal information to overseas recipients, we take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to that information. We assess the data protection standards applicable in the recipient country and implement contractual protections (data processing agreements) to help ensure APP-equivalent protections are maintained.

Where we are required to disclose information to AUSTRAC or another government authority under the AML/CTF Act, the APPs' cross-border disclosure obligations do not apply to that disclosure.

8. How Long We Retain Personal Information

We retain personal information for as long as necessary to fulfil the purposes for which it was collected, and to meet our legal, regulatory and professional obligations. Minimum retention periods include:

Record type	Minimum retention period
AML/CTF records (CDD, verification records, transaction records)	7 years from end of business relationship, or 7 years from last occasional transaction (AML/CTF Act)
Legal matter files and client records	7 years after matter closes (Legal Profession Act [Qld] and professional obligations)
Trust account records	7 years from the date of the trust transaction (trust accounting legislation)
Accounting and financial records	5 years (or longer where required by AML/CTF Act or tax law)
Marketing contact information	Until consent is withdrawn or opt-out is received, or until information becomes stale
Website / analytics data	As required for our analytics and statistical purposes; anonymised data may be retained indefinitely

When personal information is no longer required and we are not legally required to retain it, we take reasonable steps to securely destroy or de-identify it.

9. How We Protect Personal Information

We take reasonable technical and organisational steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. Our measures include:

- encrypted cloud storage and secure transmission protocols (HTTPS, TLS);
- multi-factor authentication for access to our systems;
- role-based access controls — personal information is accessible only to staff who need it to perform their role;
- regular privacy and cybersecurity training for all staff;
- vendor due diligence and contractual obligations when engaging third-party technology providers;
- physical security measures at our offices;
- a documented Data Breach Response Plan consistent with our obligations under the Notifiable Data Breaches (NDB) scheme (Part IIIIC, Privacy Act).

We maintain a Data Breach Response Plan. If we suffer an eligible data breach that is likely to result in serious harm, we will notify the Australian Information Commissioner (OAIC) and affected individuals as required. We acknowledge that transmissions to and from our website may not always be completely secure; please exercise caution when submitting information online.

If you suspect any misuse, loss or unauthorised access to your personal information held by us, please notify us immediately using the contact details in Section 13.

10. Accessing and Correcting Your Personal Information

Under the Privacy Act, you have the right to request access to personal information we hold about you, and to request that we correct information that is inaccurate, out of date, incomplete, irrelevant or misleading.

To make an access or correction request, please contact our Privacy Officer (Section 13). We will respond within 30 days. In some circumstances we may refuse access or correction — for example, where doing so would be inconsistent with our AML/CTF tipping-off obligations, where the information is subject to legal professional privilege (unless waived), or where another exception under the Privacy Act applies. If we refuse, we will give written reasons (unless unreasonable to do so) and advise you of available complaint mechanisms.

11. Your Rights Under the Privacy Act

The following rights are available to you in connection with our processing of your personal information:

- **To be informed** — this Policy sets out how we handle your personal information (APP 1 and APP 5).
- **To access your information** — subject to the exceptions in Section 10 (APP 12).
- **To correct your information** — if inaccurate, out of date, incomplete, irrelevant or misleading (APP 13).
- **To object to direct marketing** — you may opt out of marketing communications at any time by clicking 'unsubscribe' in our emails or contacting us directly.

- **To withdraw consent** — where our use of your information is based on consent, you may withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing before withdrawal.
- **Statutory tort for serious invasions of privacy (effective 10 June 2025)** — individuals may now bring a direct civil action against organisations that intentionally or recklessly seriously invade their privacy by intruding upon their seclusion or by misusing their personal information. We are committed to responsible handling of your information.
- **Automated decision-making (from 10 December 2026)** — once these provisions take effect, you will have the right to request a statement explaining how a substantially automated decision that significantly affects you was made. We will update this Policy at that time.
- **To make a complaint** — see Section 12 below.

Note: Australian law does not provide a general right to 'erasure' or 'data portability' equivalent to the GDPR. References to these rights in earlier versions of this Policy have been removed. Where information must be retained to meet our legal or professional obligations, we cannot delete it on request.

12. Privacy Complaints

If you have a concern about how we have handled your personal information, please contact our Privacy Officer in the first instance (Section 13). We will acknowledge your complaint promptly and aim to resolve it within 30 days.

If you are not satisfied with our response, or prefer not to contact us first, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

- Website: www.oaic.gov.au
- Phone: 1300 363 992
- Post: GPO Box 5218, Sydney NSW 2001

The OAIC has power to investigate complaints, make determinations and, where appropriate, seek remedies (including compensation) through the Federal Court. Under the 2024 amendments, the OAIC also has enhanced civil penalty powers including mid-tier penalties of up to AUD 3.3 million for companies for interferences with privacy.

13. Contact and Legal Information

For all queries, to exercise any of your rights, or to make a privacy complaint, please contact:

Privacy Officer — Colwell Legal Pty Ltd

Nicholas Gould, Managing Director
Colwell Legal Pty Ltd (ACN 657 194 833)
Trading as Colwell Conveyancing Group
Suite 101, 53 Endeavour Boulevard, North Lakes QLD 4509

Email: info@conveyancinggroup.com.au
Phone: 1300 359 510
Website: www.conveyancinggroup.com.au

14. Changes to This Policy

We review this Policy at least annually and update it when our practices change or when required by law. The current version is always available on our website and from our office on request. We will notify clients of material changes.

Appendix — AML/CTF Privacy Collection Notice

About this Notice

This notice is given to you under Australian Privacy Principle 5 (APP 5) of the Privacy Act 1988 (Cth). It explains how Colwell Legal Pty Ltd (ACN 657 194 833) trading as Colwell Conveyancing Group handles your personal information in connection with our obligations as a reporting entity under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act).

No signature or consent is required. We collect this information because we are required to by law. Please read this notice carefully and retain a copy for your records.

Who is collecting your information?

Colwell Legal Pty Ltd (ACN 657 194 833), trading as Colwell Conveyancing Group, Suite 101, 53 Endeavour Boulevard, North Lakes QLD 4509. We enrolled with AUSTRAC on 31 March 2026 and are a reporting entity under the AML/CTF Act from 1 July 2026.

Why are we collecting your personal information?

We are required by the AML/CTF Act to collect and verify personal information about you before or as soon as practicable after we provide you with a designated service. Specifically, we collect this information to:

- verify your identity and, where applicable, the identity of any beneficial owner;
- assess the money laundering and terrorism financing (ML/TF) risk associated with you and our service to you;
- conduct ongoing monitoring of our business relationship with you;
- meet our AML/CTF record-keeping obligations (7 years); and
- provide you with our legal and conveyancing services.

What personal information do we collect?

Depending on the nature of the transaction and your role in it, we may collect your: full legal name; date of birth; residential address; phone number and email address; occupation; source of funds or wealth; and identity document details (document type, number, expiry date and issuing country or authority).

If you are acting for or on behalf of a company, trust or other legal arrangement, we will also collect equivalent information about that entity and its ultimate beneficial owners (UBOs), including directors, trustees, partners and controlling persons.

How do we verify your identity?

We use InfoTrack, a third-party electronic identity verification service, to verify your identity documents. InfoTrack checks the details you provide against government and other authoritative databases. We do not retain photocopies or scanned copies of your identity documents. Instead, we record the document type, number, expiry date, issuing authority, the verification method used and the outcome. InfoTrack's own privacy policy governs how it handles your personal information during verification; you can find it at www.infotrack.com.au.

How do we collect your personal information?

We collect your personal information directly from you, from documents you provide, and from third-party sources including government registers, public databases, sanctions and PEP screening lists, and InfoTrack's identity verification service.

Who do we share your personal information with?

We may disclose your personal information to:

- **AUSTRAC** — as required by the AML/CTF Act (e.g., Suspicious Matter Reports, Threshold Transaction Reports);
- **InfoTrack** — for electronic identity verification purposes;
- **PEXA and Securexchange** — Australian digital settlement platforms used to complete your property transaction;
- **Microsoft 365 and Xero** — cloud-based practice management, communication and accounting platforms (see overseas recipients below);
- **Other parties to your transaction** — such as counterparty solicitors, banks, lenders and Titles Queensland — to the extent required by law and to complete your conveyancing matter; and
- **Government bodies and regulators** — where required by law.

Overseas recipients

Some of our service providers process and store data outside Australia. Microsoft 365 operates data centres in the United States and globally. Xero processes data in New Zealand and Australia. We take steps to ensure all providers handle your personal information consistently with the Australian Privacy Principles.

What if you do not provide your information?

We are required by law to verify your identity before or as soon as practicable after providing you with a designated conveyancing service. If you do not provide the information required, we may not be able to act for you.

Important: Tipping-off restriction

The AML/CTF Act prohibits us from disclosing certain information that could prejudice an AML/CTF investigation. This notice does not therefore describe all activities we may undertake in connection with our AML/CTF obligations.

How to access, correct your information or make a complaint

Contact our Privacy Officer, Nicholas Gould (Managing Director), at:

- Email: info@conveyancinggroup.com.au
- Phone: 1300 359 510
- Post: Suite 101, 53 Endeavour Boulevard, North Lakes QLD 4509

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au or 1300 363 992. Our full Privacy Policy is available at www.conveyancinggroup.com.au.