

## **AML/CTF Privacy collection notice for customer due diligence**

This privacy collection notice from Sproal & Associates Pty Ltd (ACN 159 218 023) trading as Sproal Property Law & Conveyancing (ABN 51 159 218 023) (we, us, our) outlines why we collect your personal information, what we collect, how we collect it and who we share it with.

### **Why we need to collect your information**

We collect your personal information to comply with the 'Customer Due Diligence' requirements in the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act). This includes to:

- establish and verify your identity before providing certain services to you or the person you are acting on behalf of;
- assess and manage potential money laundering, terrorism financing, proliferation financing risks or related compliance risks associated with the provision of our services;
- make reports required by law under the AML/CTF Act;
- meet record keeping obligations under the AML/CTF Act.

### **2. What personal information we collect**

In order for us to comply with the AML/CTF Act, we may collect personal information including:

- identity and contact details (name, date of birth, residential address);
- information supporting verification of identity (such as drivers licences, passports or other government-issued identification);
- your role, position or relationship with your organisation or another organisation;
- directorships, beneficial owners and other officeholder positions, company documents or trust deeds, source of funds;
- background checks and associated details including sanctions screening and politically exposed person screening information;
- sensitive information including criminal history details and information regarding political allegiances or affiliations; and
- information about you from other sources, such as from tax authorities and/or from publicly available registers/websites where you have voluntarily made your personal information available;

### **3. How we collect your information**

We may collect this information from you or your organisation, from publicly available sources and from third party service providers (InfoTrack and where applicable, their sub-processors) who assist us with conducting identity checks, background screening, verification checks and other due diligence processes.

### **4. Who we may share your information with**

We may share your personal information with third parties where appropriate, including:

- service providers that support our client due diligence processes such as background screening providers (InfoTrack and where applicable, their sub-processors);
- our related bodies corporate;

- credit reporting bodies (Equifax) and credit providers;
- government regulators (for example to update ASIC records or AUSTRAC where required under anti-money laundering and counter-terrorism financing laws);
- investigators;
- our contracted service providers, including:
  - o business support service providers;
  - o information and communication technology providers;
  - o data storage and archive service providers;
  - o research and statistical analysis providers; and/or
  - o business advisers (such as recruitment advisors, accountants, auditors and lawyers).

In each case, we will comply with the requirements of the Privacy Act that apply to disclosures of personal information and ensure that contractual arrangements and any other appropriate safeguards are in place to ensure that your personal information is protected.

## **5. What happens if we cannot collect your information**

If you do not provide us with your personal information, we may not be able to verify your identity and provide you (or the person you are acting on behalf of) with the legal services you have requested.

## **6. Your privacy rights and our privacy policy**

Our [Privacy Policy](#) contains further information about how we will handle your personal information and how you can access and correct your personal information. It also outlines how to lodge a complaint and how that complaint will be managed if you are concerned about how we handled your information.

## **7. How to contact us about your privacy**

If you have any queries about the personal information that we hold about you or the way we handle that personal information, please contact our Privacy Officer.

Mail: Sproal Privacy Officer, PO Box 1024, Launceston TAS 7250

Email: [info@sproal.au](mailto:info@sproal.au)

Telephone: 03 6331 5500

Further general information about privacy is available on the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au/](http://www.oaic.gov.au/) or by calling the OAIC's enquiry line at 1300 363 992.