Privacy Collection Notice for AML/CTF Customer Due Diligence

Narooma Law / Blessington Lawyers Pty Ltd

1. About this notice
This privacy collection notice explains how Narooma Law / Blessington Lawyers Pty Ltd collects, uses, stores and discloses personal information for anti-money laundering and counter-terrorism financing purposes.

This notice applies where Narooma Law provides, or reasonably expects that it may provide, a service regulated under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), the AML/CTF Rules or related laws.

In this notice, **AML/CTF** means anti-money laundering and counter-terrorism financing and includes obligations relating to proliferation financing where applicable.

2. Why personal information is collected
Narooma Law collects personal information where required or authorised by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), the AML/CTF Rules and related laws.

Personal information may be collected, used and disclosed for the following purposes:

1. to establish and verify the identity of a client before providing certain legal services;
2. to establish and verify the identity of a person acting on behalf of a client;
3. to identify and verify beneficial owners, controllers, trustees, directors, partners, authorised representatives or other relevant persons;
4. to assess and manage money laundering, terrorism financing, proliferation financing and related compliance risks;
5. to understand the nature and purpose of a matter, transaction or proposed service;
6. to conduct politically exposed person, sanctions or other AML/CTF screening;
7. to conduct ongoing customer due diligence where required;
8. to make reports or disclosures required or authorised by law; and
9. to comply with AML/CTF record-keeping obligations.

3. What personal information may be collected
Depending on the service requested, the type of client, the person’s role in the matter and the assessed AML/CTF risk, Narooma Law may collect some or all of the following information where reasonably necessary:

1. full name;
2. date of birth;
3. residential address;
4. contact details;
5. occupation or business activity, where relevant;
6. identity document details, such as passport, driver licence, birth certificate, citizenship certificate or other identification document details;
7. document type, document number, issuing authority, expiry date and verification outcome;
8. information about any person, company, trust, partnership, association or other entity on whose behalf a person is acting;
9. evidence of authority to act, such as a power of attorney, appointment document, company authorisation, trust deed, agency authority or other authorisation document;
10. company, partnership, trust, beneficial ownership or control information, where relevant;
11. information about the nature and purpose of the matter, transaction or requested service;

12. information relevant to source of funds or source of wealth, including supporting documents, where required having regard to the assessed AML/CTF risk;
13. information relevant to politically exposed person status, sanctions exposure or other AML/CTF risk indicators; and
14. other information reasonably required to comply with AML/CTF obligations.

4. Sensitive information
Narooma Law may collect sensitive information where reasonably necessary for AML/CTF purposes, including information relevant to whether a person, family member or close associate is, or has been, a politically exposed person or is subject to sanctions.

If biometric identity verification is used, such as facial matching or liveness detection, further information will be provided and consent will be sought before biometric information is collected, unless collection is otherwise permitted by law.

5. How personal information is collected
Narooma Law will generally collect personal information:

1. directly from the relevant person, including in person, by telephone, email, form, online portal or electronic verification process;
2. from a person authorised to act on behalf of the relevant person;
3. from company, trust, land, court, regulatory or public registers;
4. from third-party identity verification, AML/CTF screening, technology or compliance service providers, including InfoTrack;
5. from professional intermediaries, advisers, agents or representatives involved in the matter; and
6. from other sources where required or authorised by law or where reasonably necessary for AML/CTF compliance.

Where an electronic identity verification service is used, Narooma Law may provide or collect information through that service to verify identity and complete AML/CTF checks.

Narooma Law will seek to retain only the information reasonably necessary to demonstrate that identity verification and AML/CTF checks were completed, such as document type, document number, verification outcome and date of verification. Copies of full identity documents will be retained for AML/CTF record-keeping purposes where required or authorised by another law or necessary for another permitted purpose.

6. Credit reporting body identity verification
A credit reporting body may be used to assist with identity verification; however an alternative means of identity verification will be made available.

7. Who personal information may be disclosed to
Narooma Law may disclose personal information to:

1. AUSTRAC, regulators, law enforcement bodies, government agencies or other authorities where required or authorised by law;
2. identity verification, AML/CTF screening, technology, data storage and compliance service providers, including InfoTrack;
3. professional advisers, agents, representatives, financial institutions, settlement agents, conveyancing platform providers or other parties involved in a matter, where authorised or otherwise permitted by law;
4. entities within any AML/CTF reporting group, if applicable;
5. courts, tribunals, dispute resolution bodies or regulators, where required or authorised by law; and
6. other persons or entities where required or authorised by law.

In some circumstances, the law may prevent Narooma Law from giving further details about a disclosure.

8. Overseas disclosure
Some service providers may store or access personal information overseas. Where personal information is disclosed overseas, Narooma Law will take reasonable steps required by the *Privacy Act 1988* (Cth) to protect that information.

9. What happens if personal information is not provided

If information reasonably required for AML/CTF purposes is not provided, Narooma Law may be unable to verify identity, complete customer due diligence, satisfy AML/CTF obligations or provide the requested services.

If work has already commenced, Narooma Law may be required to delay, suspend or terminate the provision of services.

10. Privacy rights and Privacy Policy

Narooma Law's Privacy Policy contains further information about how personal information is handled, including:

1. how a person may request access to personal information held by Narooma Law;
2. how a person may request correction of personal information;
3. how a privacy complaint may be made; and
4. how Narooma Law will deal with a privacy complaint.

A copy of Narooma Law's Privacy Policy is available upon request.

11. Contact details

Privacy enquiries may be directed to:
The Practice Manager
Narooma Law / Blessington Lawyers Pty Ltd
PO Box 768
Narooma NSW 2546
Email: admin@naroomalaw.com.au
Telephone: 02 4476 5300

12. Date of notice

This notice is current as at 1 July 2026.