

## Privacy Policy

### 1. Introduction

Law Central Legal Pty Ltd (ACN 603 550 198) (**Law Central Legal, we, us, or our**) is committed to managing personal information in accordance with the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**) and in compliance with obligations arising under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**).

### 2. Application of Privacy Policy

- 2.1 Although Law Central Legal is a small business that may otherwise be exempt from certain requirements under the Privacy Act, compliance is mandatory due to the provision of designated services under the AML/CTF Act.
- 2.2 This Privacy Policy applies only to personal information collected, held, used, or disclosed by Law Central Legal for the purposes of, or in connection with, its obligations under the AML/CTF Act.
- 2.3 This Privacy Policy does not apply to any information collected, held, used, or disclosed by Law Central Legal which is not for the purposes of, or not in connection with, with its obligations under the AML/CTF Act.

### 3. Definitions

**personal information** means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether or not the information is true and whether or not the information is recorded in a material form.

**sensitive information** includes information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, health information, or any other information classified as "sensitive information" under the Privacy Act.

**AML/CTF designated services** means services for which Law Central Legal is required to comply with the AML/CTF Act, including but not limited to certain legal services and verifying client identity.

### 4. Personal Information We Collect

- 4.1 We collect personal information reasonably necessary for carrying out our functions and activities and for providing legal and AML/CTF designated services. The types of personal information collected may include:
  - (a) names, contact details, postal and email addresses, telephone numbers, and identification documents;
  - (b) financial information, transactional data, and Know Your Customer (**KYC**) records;
  - (c) employment details and professional qualifications;
  - (d) sensitive information where relevant and permitted by law, including criminal records and health information;
  - (e) information relating to your engagement with Law Central Legal as a client, supplier, contractor, or event participant;
  - (f) any additional information provided by or authorised by you during interaction with Law Central Legal.
- 4.2 The collection of personal information occurs:
  - (a) directly from you via client onboarding, engagement forms, correspondence (in person, by telephone, email, or online contact);

- (b) from third parties (including regulatory authorities, AUSTRAC, contractors, recruitment agencies, referees, service providers, professional bodies, public registers, affiliates and related entities);
- (c) via our website and digital platforms, including through cookies and tracking technologies, but only to the extent permitted by law and not for the purpose of uniquely identifying you unless you provide such information.

- 4.3 Where we collect information from sources other than you, we will take reasonable steps to notify you or to ensure you are aware of this collection.

### 5. Purposes for Collection, Use and Disclosure

- 5.1 We collect, hold, use, and disclose personal information primarily for the following purposes:
  - (a) to provide legal services and AML/CTF designated services;
  - (b) to conduct KYC procedures, verify identities, and fulfil AML/CTF Act verification obligations;
  - (c) to report suspicious matters or transactions to AUSTRAC or any regulatory authority as required by the AML/CTF Act and applicable laws;
  - (d) to manage client relationships, billing, and administrative engagements;
  - (e) to comply with legal obligations (including responding to subpoenas, court orders, statutory directions, or criminal investigations);
  - (f) to facilitate recruitment and personnel management;
  - (g) to inform you about Law Central Legal services, news, and developments, unless you opt out;
  - (h) to improve the quality of services, conduct risk management, staff training, internal compliance, and quality assurance;
  - (i) to respond to enquiries, complaints, and requests relating to privacy;
  - (j) for any other purpose required or permitted by law, or as consented to by you.
- 5.2 Where disclosure is required under the AML/CTF Act or other laws, such disclosure will override any confidentiality obligations which are inconsistent with mandatory reporting requirements.

### 6. Disclosure to Third Parties and Overseas Recipients

- 6.1 We may disclose personal information to:
  - (a) service providers, contractors, and consultants engaged for business, administrative, IT or legal purposes;
  - (b) affiliates and related entities in Australia and overseas;
  - (c) government agencies, AUSTRAC, courts and law enforcement, as required by law;
  - (d) other parties where disclosure is reasonably necessary, permitted or required by law.
- 6.2 Cross-Border Data Disclosure (APP 8 Compliance):
  - (a) Where personal information is disclosed to overseas recipients, we will take reasonable steps to ensure the recipient does not breach the APPs – including, where practicable, entering into enforceable contractual arrangements, undertaking adequacy assessments of recipient jurisdictions, or securing consents where required.

- (b) The countries to which your personal information may be transferred will depend on the nature of our services and will be disclosed to you where reasonably identifiable and relevant.
- (c) If your personal information is transferred to a recipient in a country with data protection laws substantially similar to the APPs and mechanisms to enforce protection, Law Central Legal will not be liable for a breach of the APP in that jurisdiction. Where transferred to jurisdictions without comparable laws, we will seek to contractually ensure compliance or otherwise notify you and disclaim responsibility pursuant to legal requirements.

## 7. Data Retention and Security

- 7.1 We store personal information in secure electronic and paper form and employ industry-standard measures to protect against unauthorised access, modification, misuse, loss, or disclosure, including:
  - (a) secure premises and restricted physical access protocols;
  - (b) industry-standard encryption, firewalls, password protection, and other information security systems;
  - (c) data storage with “trusted third-party storage providers” (here meaning suppliers approved by Law Central Legal and meeting Australian privacy standards).
- 7.2 Data Retention Periods:
  - (a) For AML/CTF Act compliance, records of client identification, KYC, and transactions are retained for not less than seven years or as otherwise specified by AUSTRAC or regulatory authorities.
  - (b) Other personal and sensitive information will be retained only as required for business, legal, or regulatory purposes.
  - (c) Upon expiry of legal retention obligations, or when information is no longer required, we will take reasonable steps to securely destroy or de-identify personal information, unless retention is otherwise required by law.

## 8. Access and Correction

- 8.1 You are entitled to request access to the personal information Law Central Legal holds about you and to request correction of that information if it is inaccurate, incomplete or out-of-date.
- 8.2 Requests should be submitted in writing to the Privacy Officer (see contact details below). We will respond within a reasonable period and may charge for reasonable time and expenses incurred in compiling information, not for making the request.
- 8.3 If your request is refused, we will provide written reasons and advise you of your further options, including making a statement of correction or lodging a complaint.

## 9. Direct Marketing

- 9.1 We may use personal information to inform you about Law Central Legal services, news, or legal updates. Direct marketing communications will contain a simple means to opt out (such as an “unsubscribe” link or clear contact option).
- 9.2 You may opt out at any time by contacting the Privacy Officer.
- 9.3 Sensitive information will not be used for direct marketing.

## 10. Data Breach Notifications

- 10.1 Law Central Legal complies with the Notifiable Data Breaches scheme in the Privacy Act. In the event of an eligible data breach, we will promptly notify affected

individuals and the Office of the Australian Information Commissioner (**OAIC**) as required by law.

- 10.2 We maintain an internal Data Breach Response Plan to respond to such incidents efficiently and effectively.

## 11. Complaint Handling

- 11.1 If you have any concerns, complaints, or questions regarding personal information or this Privacy Policy, contact the Privacy Officer using the details below.
- 11.2 The Privacy Officer will assess the complaint and, where appropriate, take immediate steps to resolve it. For more complex cases, an investigation will be conducted and a response provided within 30 days.
- 11.3 If you are dissatisfied with our response, you may escalate the matter to the OAIC ([www.oaic.gov.au](http://www.oaic.gov.au), phone 1300 363 992).

## 12. Internal Training and Policy Communications

- 12.1 All staff are provided with training on privacy law obligations, the APPs, and compliance practices, including AML/CTF Act-specific privacy considerations.
- 12.2 The Privacy Policy is communicated to all employees and made available to clients and stakeholders via our website and on request.

## 13. Policy Review and Updates

- 13.1 This Privacy Policy is reviewed at least annually and is updated following legal, regulatory, or business developments.
- 13.2 Updates are published on our website and are available on request. We recommend periodic review for changes.

## CONTACT DETAILS

The Privacy Officer

Law Central Legal Pty Ltd (ACN 603 550 198)

Address: Level 4, 200 Adelaide Terrace, East Perth, WA 6004

Email: [John@lawcentrallegal.com.au](mailto:John@lawcentrallegal.com.au)

Telephone: (08) 9476 4999

This Privacy Policy was last updated on: 24 June 2026.