Privacy Policy

1. Introduction

GEOFF LYONS SOLICITORS PTY LTD ABN 86 084 580 384 are referred to in this Privacy Policy as **we**, **us** or **our**.

This Privacy Policy explains how we manage personal information. It also describes your rights to access and correct personal information we hold about you, and how you can make a complaint about our management of your personal information. This is in addition to our obligations of confidentiality to clients and other parties arising from sources other than the Privacy Act.

1.1. Application of this Policy

This Privacy Policy only applies to some of the personal information we manage. It only applies to personal information we manage for the purposes of or in connection with our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (the **AML/CTF Act**).

Other personal information we manage remains excluded by applicable exemptions in the Privacy Act.

1.2. Policy Updates

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The current version will be available on our website at https://glyons.com.au/.

2. Personal information: what we collect

2.1. Types of personal information

We collect your contact and identity details, financial information and case related information about you and any relevant entity or person. This may include sensitive information.

2.2. Identity Verification and the AML/CTF Act

We may be required to verify your identity and collect certain information under the AML/CTF Act when we provide designated services. Identity documents might also be required for other services such as court matters, real property transactions and asset dealings.

This includes collecting identification documents and information about the source of funds and beneficial ownership of entities.

3. How we collect personal information

3.1. Sources of information

We collect information directly from our clients, from other lawyers, government sources or public sources such as registers or the internet.

3.2. Anonymity and Pseudonymity

If you are a client, you have the option of requesting to deal with us anonymously or by using a pseudonym. However, in most cases this is not lawful nor practical for legal services. If you do not provide us with the personal information we request, we may not be able to provide you with legal services or respond to your enquiry.

4. Why we collect personal information and how we use it

We collect, hold, use and disclose personal information for the primary purpose of providing legal services to our clients, complying with regulatory and insurance obligations and operating our legal practice.

Secondary purposes include financial management, system improvement, enforcement of our right to payment and managing the relationship between our firm and former clients once the retainer has concluded.

5. Disclosure of Personal Information

We may disclose personal information to third parties to facilitate the purposes of collection noted in section 4. These purposes include disclosure to parties to proceedings or transactions and their representatives, to Courts, government and regulatory agencies as may be necessary or appropriate to establish legal rights and to progress transactions in which we are instructed. We also disclose information to third parties (such as data storage or archiving companies, our regulators or our insurers) who hold or process information for us.

6. Security of Personal Information

6.1. Security Measures

We hold your personal information using a system designed to protect against data breaches, however like all data security systems, risks may only be mitigated but not eliminated. It is our practice to require our storage service providers to be reputable [and to seek assurances from them regarding security and confidentiality].

6.2. Retention and Destruction

We retain personal information for as long as necessary to fulfil the purposes for which it was collected, to comply with our legal and professional obligations and to ensure that pertinent evidence remains available if reasonably required.

7. Third party websites

Our website may contain links to third party websites, such as payment processors. We are not responsible for the privacy practices of those websites, and we encourage you to read their privacy policies.

8. Access and Correction

8.1. Access to and correction of your Personal Information

You have the right to request access to or correction of the personal information we hold about you. To make an access request, please contact our Privacy Officer (see Section 10).

If we refuse to correct your personal information, we will provide written reasons for the refusal and information about how you may complain.

The Privacy Act permits us to refuse access in some circumstances. If we refuse your access request, we will provide you with written reasons for the refusal (unless unreasonable to do so or we are prohibited from doing so by law) and information about how you may complain.

9. Complaints and questions

If you have a question about this policy or complaint about how we have handled your personal information, please contact our office. We ask that you provide details of your complaint in writing. We will acknowledge your complaint within 5 business days and investigate it promptly. We aim to resolve complaints within 30 days. If we need more time, we will keep you informed of our progress.