

Mal Ryan & Glen is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes but is not limited to names, addresses, email addresses, dates of birth and phone numbers, as well as tax residency and tax status information.

We are also required to 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 collecting personal information 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.

We may ask you to provide original or certified copies of your identity documents to comply with any or all of these requirements.

We may also collect the following sensitive information:

- whether you are a member of any political associations, professional or trade associations may be used to verify your occupation or determine whether you are a politically exposed person for AML/CTF compliance purposes.

How we collect your personal information

This Personal Information is obtained in many ways including but not limited to:

- during face-to-face meetings,
- virtual meetings,

- by telephone,
- by email,
- via our website <https://www.malryanglen.com.au/>,
- using InfotrackID for AML/CTF information collection, identity verification and ARNECC client authorisation requirements,
- from third parties such as accountants and financial advisors, insurance providers, medical practitioners, government agencies and courts, financial institutions and brokers, other legal practitioners and other organisations,

We will obtain your authority prior to requesting any health or financial information about you.

We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you which includes:

- To assess inquiries,
- To provide legal advice;
- To progress a legal claim or matter;
- To obtain litigation funding;
- To meet our legal and regulatory obligations; and
- To conduct marketing.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

Although it is your right not to provide personal information, we may not be able to provide you with the relevant legal service without it.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

Data Security

We take appropriate technical and organisational measures to protect your personal information from unauthorised access, disclosure, alteration or destruction. However, no

internet transmission or electronic storage is completely secure. We hold personal information in confidential secure paper and electronic files. We take all reasonable precautions to ensure that your personal information is not accessed by unauthorised parties or lost.

We will immediately notify you if we become aware of any potential breach of our information storage systems. You must also immediately notify us if you have any concerns regarding the security of your information or electronic communications with us and you must take all reasonable precautions to ensure your communications with us are secure when providing personal information.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties, including but not limited to the State Revenue Office, PEXA, ARNECC, The Registrar of Titles, the Australian Taxation Office, the Australian Death Notification Registry, an Australian Court,
- Third parties, including AUSTRAC, to assist with AML/CTF and ARNECC legal and regulatory obligations including identity verification and personal information storage and disclosure,
- Third party account services for billing and debt recovery,
- Our professional advisors, including accountants, auditors and IT service providers,
- Third parties as listed within this Policy which are involved in your matter where you consent to the use or disclosure; and
- Where required or authorised by law.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Mal Ryan & Glen will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

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 or comply with our AML/CTF responsibilities and provide you (or the person or organisation you are acting on behalf of) with the services you have requested.

Website use

This Privacy Policy is to be read in conjunction with our Website Terms of Use, which can be found on our website.

IP addresses

Our website site may also collect Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. We collect and manage IP addresses as part of the service of providing internet session management and for security purposes. We may also collect and use web log, computer and connection information for security purposes and to help prevent and detect any misuse of, or fraudulent activities involving, our website.

Cookies

Our website may use "cookies" to help personalise your online experience. A cookie is a text file or a packet of information that is placed on your hard disk by a web page server to identify and interact more effectively with your computer. There are two types of cookies that may be used on our website: a persistent cookie and a session cookie. A persistent cookie is entered by your web browser into the "Cookies" folder on your computer and remains in that folder after you close your browser, and may be used by your browser on subsequent visits to our website. A session cookie is held temporarily in your computer's memory and disappears after you close your browser or shut down your computer. Cookies cannot be used to run programs. Cookies

are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. In some cases, cookies may collect and store personal information about you. We extend the same privacy protection to your personal information, whether gathered via cookies or from other sources.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions to learn more about these functions. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our website.

Why we use cookies

Our website uses cookies in order to:

- remember your preferences for using our website;
- show relevant notifications to you (eg, notifications that are relevant only to users who have, or have not, subscribed to newsletters or email or other subscription services); and
- remember details of data that you choose to submit to us (eg, through online contact forms).

Many of these cookies are removed or cleared when you log out but some may remain so that your preferences are remembered for future sessions.

Third party cookies

In some cases, third parties may place cookies through our website. For example:

- Google Analytics, one of the most widespread and trusted website analytics solutions, may use cookies de-identified data about how long users spend on this site and the pages that they visit;
- Google AdSense, one of the most widespread and trusted website advertising solutions, may use cookies to serve more relevant advertisements across the web and limit the number of times that a particular advertisement is shown to you; and
- third party social media applications (eg, TikTok, Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc) may use cookies in order to facilitate various social media buttons and/or plugins in our website.

Your privacy rights and our privacy policy

This Privacy Policy may change from time to time and is available on our website.

This Privacy Policy contains information about how we will handle your personal information and how you can access and correct your personal information. It also outlines our complaint handling procedure.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy or the treatment of your personal information, please contact us using the contact details below. A member of our staff will contact you to confirm receipt of your complaint within 3 business days of receiving your complaint. Depending on the complexity of your complaint, our Privacy Complaints Officer will then provide you with a substantive response between 14 and 30 days after receiving your complaint.

We will make every reasonable effort to resolve any complaint you may have regarding your personal information to your satisfaction. However, if you are not satisfied with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

If you have a complaint regarding the management of your personal information by us, please contact:

Attn: Privacy Complaints Officer

Mal Ryan & Glen

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