REAL PROPERTY CONVEYANCING

PRIVACY POLICY

Version 1.0 | Effective date: 3rd September, 2026

Introduction

Real Property Conveyancing (25 668 055 516) 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. 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) — principally, information collected in connection with the designated conveyancing services we provide (assisting in the planning or execution of a transaction to buy, sell or transfer real estate).

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

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 www.rpclaw.com.au

3. Types of Personal Information

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

The types of personal information we may collect include:

- Identity information: name, date of birth, gender, signature, photographic identification, offices or directorships held;
- Contact information: residential and postal addresses, email addresses, telephone numbers;
- Professional and business information: occupation, employer, job title, business holdings and structures (e.g. where a company or trust is a party to your transaction);
- Financial information: bank account details, loan and financial institution details, billing information, payment card details, and — where required for your transaction — tax file numbers*;
- Transaction information: details of the property, contract of sale, and settlement figures relevant to your matter;
- Communication records: records of correspondence and communications with you;
- Website and technical data: IP address, browser type, device information, pages visited, cookies; and

- Sensitive information: occasionally, information such as health information, where directly relevant to your matter (for example, capacity to transact).

* Tax file numbers are handled in accordance with the *Privacy (Tax File Number) Rule 2015*.

4. Identity Verification and the AML/CTF Act

We are required to verify your identity and collect certain information under the AML/CTF Act because we provide designated services (assisting in real property transactions). Identity documents may also be required for other purposes connected with your transaction, such as Titles Queensland and PEXA requirements.

This includes collecting identification documents and, where relevant, information about the source of funds and beneficial ownership of any entity involved in your transaction.

5. How We Collect Personal Information

We collect information directly from our clients, from other conveyancers or solicitors, real estate agents, financial institutions, government sources, or public sources such as land title registers.

Direct Collection

Where reasonable and practicable, we collect personal information directly from you. This may occur when you:

- engage us to provide conveyancing services;
- respond to communication with us, or engage an agent to do so;
- contact us by telephone, email, post or in person;
- complete forms or provide identification and other documents to us;
- visit our website or use our online services; or
- apply for employment with us.

Indirect Collection

We may also collect personal information about you from third parties, including:

- our client(s), where we collect information in the course of providing conveyancing services;
- the other party to your transaction and their solicitor, conveyancer or real estate agent;
- financial institutions and lenders involved in your transaction;
- Titles Queensland, PEXA and other government or land registry bodies;
- publicly available sources, including public registers and websites; and
- identity verification service providers engaged to satisfy our AML/CTF and VOI obligations.

6. 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 conveyancing services, given our obligation to verify the identity of parties to a property transaction. If you do not provide us with the personal information we request, we may not be able to provide you with conveyancing services or respond to your enquiry.

7. Why We Collect Personal Information and How We Use It

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

Primary Purposes

This includes:

- providing conveyancing advice and services to you or to our client(s);
- managing client matters and files;
- preparing, reviewing and exchanging contracts and other transaction documents;
- conducting searches and settlement;
- communicating with you and other parties to the transaction;
- billing and collecting fees, including pursuit of our rights under a Costs Agreement or retainer;
- complying with our legal, professional and insurance obligations, including the AML/CTF Act; and
- administering and managing our firm.

Secondary Purposes

We may also use and disclose personal information for secondary purposes that are related to our primary purposes, including:

- maintaining and developing our relationship with you;
- quality assurance and improvement of our services;
- training and professional development;
- ongoing Customer Due Diligence as required by the AML/CTF Act;
- enforcement of our right to payment of fees;
- internal reporting and analysis; and
- risk management and insurance purposes.

8. Disclosure of Personal Information

We may disclose personal information to third parties to facilitate the purposes of collection noted in section 8. These purposes include disclosure to parties to your transaction and their representatives, to government and regulatory agencies as may be necessary or appropriate 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.

Your personal information and confidential data is held by us subject to our duty of confidentiality under the Australian Solicitors' Conduct Rules ("ASCR") and any applicable undertakings. We may disclose personal information to third parties subject to those obligations and for the purposes described in this Privacy Policy, including:

- to discharge our professional obligations to you or to our clients, or in the reasonable execution of our instructions;

- to comply with our legal obligations, or to disclose information under the AML/CTF Act (including reports to AUSTRAC), the Legal Profession Act, or other relevant legislation;
- to the other party's solicitor, conveyancer or real estate agent, other parties to the transaction, and financial institutions or lenders, as instructed or reasonably necessary;
- Titles Queensland, PEXA, government agencies and regulators (including the Queensland Law Society);
- our professional indemnity insurers;
- a Costs Assessor in the event that an assessment is ordered or reasonably necessary;
- service providers who support our practice (including IT, document management and PEXA platform providers);
- as permitted under the ASCR confidentiality exceptions; and
- any person you expressly or impliedly authorise us to disclose information to.

9. Overseas Disclosure

We may disclose personal information to recipients located outside Australia where reasonably necessary or convenient to facilitate the purposes of collection, holding, use and disclosure of information stated in sections 4 and 9 of this Policy.

The following circumstances are common examples of when that may apply:

- where your matter involves overseas parties;
- to our staff or contractors if working or travelling overseas;
- to parties such as regulators and auditors who may use overseas processors or offices;
- to service providers whose systems or servers are located overseas (including cloud storage and IT service providers), where we consider the confidentiality arrangements applying to that information are sufficient; and
- where you instruct or authorise us to do so.

10. Security of Personal Information

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.

11. 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.

12. 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.

13. 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 16).

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.

- We will respond to your request within a reasonable period, generally within 30 days. We may charge a reasonable fee to cover the costs of locating, retrieving and providing the information. If you are a client or former client we do not charge for recovery or storage of records that are your property, but may charge for costs incurred in retrieval of other records, or where urgent timelines or requests for documents to be delivered remotely incur additional outlays.
- If you are not a client or former client, our confidentiality obligations to them and other relevant exemptions under the Privacy Act may preclude us giving you the information requested. A request for search or recovery costs in advance does not mean that information will necessarily be released. We will inform you of any applicable fees before processing your request.

Correction of Your Personal Information

- We take reasonable steps to ensure that the personal information we hold during the currency of your matter is accurate, up-to-date, complete and relevant. Records held subsequent to the completion of our work for you will not be monitored or updated unless further instructions are issued. If you believe that personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request that we correct it.
- We will respond to correction requests within a reasonable period. If we correct information that we have previously disclosed to a third party, we will notify that third party of the correction if you request us to do so.

14. Complaints and Questions

If you have a question about this policy or a complaint about how we have handled your personal information, please contact our Privacy Officer. 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.

You may also contact the relevant legal services regulator in your State or Territory.

15. Privacy Officer

Privacy Officer	Christina McKirdy, Principal
Firm	Real Property Conveyancing
Address	1/45 Boyland Avenue, Coopers Plains, Queensland 4108
Email	christina@rpclaw.com.au
Phone	1300 772 529

If you are not satisfied with our response, you may escalate your complaint to:

- Office of the Australian Information Commissioner (OAIC) or the Legal Services Commission.
- Website: www.oaic.gov.au

- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au
- Post: GPO Box 5218, Sydney NSW 2001

17. Version History

Version	Date	Change Log
1.0	03/09/2026	Initial policy adopted for AML/CTF designated services (conveyancing).

— End of Privacy Policy —