

Ashlee Deaan Loder (trading as Connected Conveyancing)

GDPR AND UK GDPR PRIVACY NOTICE

For clients located in the EU, EEA or United Kingdom | ABN: 46 103 817 887



Why are you receiving this notice?

You are receiving this notice because you have indicated that you are currently resident in a country that is a member of the European Union (EU) or European Economic Area (EEA), or in the United Kingdom (UK). The EU General Data Protection Regulation (GDPR) or the UK General Data Protection Regulation (UK GDPR) may apply to the personal information we hold about you, depending on where you are located. This notice sets out our obligations under those laws and your rights. It should be read alongside our Privacy Policy, which is available at <https://connectedconvey.com.au/> or on request.

1. Who controls your personal information

The data controller for the purposes of the GDPR is Ashlee Deaan Loder (trading as Connected Conveyancing) (ABN 46 103 817 887), a licensed conveyancing practice operating in New South Wales, Australia.

Privacy contact: Ashlee Deaan Loder, Principal Licensed Conveyancer

Email: ashlee@connectedconvey.com.au

Phone: 02 4761 9991

We do not have a Data Protection Officer. For any queries about how we handle your personal information, please contact our privacy contact above.

2. What personal information we hold about you

In connection with your conveyancing matter, we may hold the following categories of personal information about you:

- identifying information: full name, date of birth and residential address
- contact details: phone number and email address
- identification documents: driver's licence and passport details
- identity verification data: facial images or biometric data collected as part of the verification process
- financial information: account and payment details relevant to your property settlement
- property details: information about the property being bought, sold or transferred
- matter-related information: personal circumstances relevant to your matter, such as information relating to a deceased estate or a relationship breakdown
- third-party details: information about other persons involved in your matter, such as a co-purchaser or co-vendor

3. Where we collected your information

We collect most of your personal information directly from you during the onboarding process.

We may also receive information about you from third parties where this is necessary for your matter, including real estate agents, financiers, land registries, government agencies and the other party's conveyancing representative.

We engage third-party identity verification providers who may collect identity documents and biometric data directly from you. Those providers operate under their own privacy policies.

4. Why we process your information and our legal basis

We process your personal information on the following legal bases under Article 6 of the GDPR:

- **Performance of a contract (Article 6(1)(b)):** to provide the conveyancing and property settlement services you have engaged us to perform
- **Compliance with a legal obligation (Article 6(1)(c)):** including identity verification and anti-money laundering reporting requirements under Australian law

Where we collect biometric or other sensitive personal information as part of the identity verification process, we do so on the basis of your explicit consent under Article 9(2)(a) of the GDPR. You may withdraw that consent at any time, but doing so may mean we are unable to act for you in your transaction.

5. Who we share your information with

We may disclose your personal information to the following categories of recipients:

- land registries and government agencies in Australia
- the other party's conveyancing or legal representative
- your financier, lender or mortgage broker
- deposit bond/guarantee agencies
- real estate agents involved in your matter
- title insurers and settlement agents
- e-conveyancing platforms
- third-party identity verification providers
- AUSTRAC (the Australian Transaction Reports and Analysis Centre) and other Australian regulators, where required by law
- our professional advisers, including accountants and insurers
- cloud-based software providers and AI tools we use to manage our practice

6. Transfer of your information to Australia

Your personal information is held and processed in Australia. Australia is not currently recognised by the European Commission as providing an adequate level of data protection under the EU GDPR. Australia also does not currently hold an adequacy decision from the United Kingdom under the UK GDPR.

Where your personal information is transferred from the EU or EEA to Australia, we rely on one or more of the grounds permitted under Article 49 of the EU GDPR: the transfer is necessary for the performance of a contract between you and us, or you have given your explicit consent to the transfer after being informed of the possible risks. Where your personal information is transferred from the United Kingdom to Australia, we rely on the equivalent grounds available under Article 49 of the UK GDPR on the same basis.

Once held in Australia, your information may also be stored or processed using offshore cloud services. Please ask us if you would like more information about the offshore providers we use.

7. How long we keep your information

We keep your personal information for at least seven years from the end of your matter, or longer where required by law, our professional obligations, or our professional indemnity insurance requirements.

After the applicable retention period, we take reasonable steps to securely destroy or de-identify your personal information.

8. Do you have to provide your information?

Some of the personal information we collect is required by Australian law. We must verify your identity before providing conveyancing services. If you do not provide the information required for identity verification, we will be unable to act for you.

Other personal information is required to perform the conveyancing services you have engaged us to provide. If you choose not to provide certain information, we may be unable to complete your matter.

9. Automated decision-making

We do not make decisions about you using solely automated processing, including profiling, that produce legal or similarly significant effects on you.

10. Your rights under the GDPR and UK GDPR

As an individual located in the EU, EEA or United Kingdom, you have the following rights in relation to your personal information. These rights apply under both the EU GDPR and the UK GDPR and are substantially the same under each:

- **Right of access (Article 15):** you may request a copy of the personal information we hold about you
- **Right to rectification (Article 16):** you may ask us to correct inaccurate or incomplete information
- **Right to erasure (Article 17):** you may ask us to delete your personal information in certain circumstances.
- **Right to restriction (Article 18):** you may ask us to restrict our processing of your information in certain circumstances
- **Right to data portability (Article 20):** you may ask us to provide your information in a structured, commonly used and machine-readable format
- **Right to object (Article 21):** you may object to our processing of your information in certain circumstances
- **Right to withdraw consent (Article 7(3)):** where we process your personal information on the basis of your consent - including consent to the processing of biometric or other sensitive personal information under Article 9(2)(a) of the GDPR - you may withdraw that consent at any time by contacting us at **[Contact Email Address]**. Withdrawal of consent does not affect the lawfulness of any processing carried out before the withdrawal. Where it is reasonably practicable to do so, we will give effect to a withdrawal of consent as soon as reasonably practicable after receiving your request. Please note that withdrawal may mean we are unable to continue to act for you in your conveyancing matter.
- Some of these rights are not absolute. In particular, we are required by Australian law to retain identity verification and transaction records for at least seven years in some circumstances. This obligation cannot be overridden by a request for erasure or a withdrawal of consent. Where a right does not apply in full or is subject to a legal exception, we will explain the position when you make a request.

To exercise any of your rights, contact us at ashlee@connectedconvey.com.au. We will respond without undue delay and within one month of your request, as required by the GDPR.

11. How to complain

If you believe we have not handled your personal information in accordance with the GDPR, you may:

- **Contact us directly:** ashlee@connectedconvey.com.au. We will endeavour to respond within 30 days.
- **Lodge a complaint with the OAIC:** www.oaic.gov.au or 1300 363 992
- **If you are located in the United Kingdom: Lodge a complaint with the Information Commissioner's Office (ICO):** www.ico.org.uk or 0303 123 1113
- **If you are located in the EU or EEA: Lodge a complaint with your local EU data protection authority (supervisory authority):** you have the right to complain to the supervisory authority in the EU or EEA member state where you live, work or where the alleged breach occurred

12. Contact us

For any questions about this notice or how we handle your personal information:

Ashlee Deaan Loder (trading as Connected Conveyancing)

Privacy contact: Ashlee Deaan Loder, Principal Licensed Conveyancer

Email: ashlee@connectedconvey.com.au

Phone: 02 4761 9991

Website: <https://connectedconvey.com.au/>

This notice is provided in accordance with Articles 13 and 14 of the EU General Data Protection Regulation and the equivalent provisions of the UK General Data Protection Regulation. It should be read alongside the Connected Conveyancing Privacy Policy, available at <https://connectedconvey.com.au/>