

PREPARED BY HALO CONVEYANCING ABN 14 618 516 590

DATE REVIEWED: 1 JULY 2026



HALO CONVEYANCING

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*Your Property Guardian*

# HALO CONVEYANCING – AML/CTF PRIVACY POLICY & COLLECTION NOTICE (2026)

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HALO CONVEYANCING

## **PART 1 — AML/CTF PRIVACY POLICY**

- 1. Our commitment Halo Conveyancing is committed to protecting your privacy. We collect, use, share, process, and manage Personal Information only as reasonably necessary for carrying out our functions and activities.**

**If we prepare to provide, provide you with, or reasonably anticipate that we may provide you with any Designated Services, we will handle your Personal Information in an open and transparent way, subject to our legal obligations, in accordance with this Privacy Policy.**

### **2. What this Privacy Policy covers**

This Privacy Policy applies only to Personal Information handled in connection with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and AML/CTF Rules 2025.

Other parts of our conveyancing practice may be outside the Privacy Act. We still handle that information confidentially under:

Conveyancers Licensing Act 2003 (NSW)

Conveyancers Licensing Regulation 2021 (NSW)

Legal Profession Uniform Law (NSW)

Legal Profession Uniform Law Australian Solicitors' Conduct Rules 2015 (NSW)

Legal Profession Uniform General Rules 2015 (NSW)

### **3. Meaning of words used in this Privacy Policy**

3.1 AML/CTF Act Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

3.2 AML/CTF Framework AML/CTF Act, AML/CTF Rules 2025, and AUSTRAC guidance.

3.3 AML/CTF Rules Anti-Money Laundering and Terrorism Financing Rules 2025 (Cth).

3.4 APP/s Australian Privacy Principles in Schedule 1 of the Privacy Act.

3.5 AUSTRAC

Australian Transaction Reports and Analysis Centre.

3.6 Designated Services

Services described in Table 6 of section 6 of the AML/CTF Act, including: assisting a person to buy, sell, or transfer real estate; receiving, holding, controlling, or managing a person's money or property while assisting them with a transaction; assisting a person with debt or equity financing related to a legal arrangement.

3.7 We, us, our

Halo Conveyancing (ABN 14 618 516 590).

### 3.8 KYC

Information required to establish initial and ongoing customer due diligence matters under the AML/CTF Act, including: identity information; beneficial ownership; authority of persons acting on behalf of clients; PEP status; source of funds and source of wealth; nature and purpose of the transaction.

### 3.9 OAIC

Office of the Australian Information Commissioner.

### 3.10 Personal Information

Information or an opinion about an identified individual, or an individual who is reasonably identifiable, provided to us for AML/CTF purposes.

### 3.11 Sensitive Information

As defined in the Privacy Act.

## **4. Regulatory framework – Conveyancing (NSW)**

Halo Conveyancing is licensed and regulated by NSW Fair Trading under the Conveyancers Licensing Act 2003 (NSW) and the Conveyancers Licensing Regulation 2021 (NSW).

We also comply with: Legal Profession Uniform Law (NSW) Legal Profession Uniform Law Australian Solicitors' Conduct Rules 2015 (NSW) Legal Profession Uniform General Rules 2015 (NSW) Duties Act 1997 (NSW) ARNECC Model Participation Rules electronic conveyancing obligations (including PEXA requirements)

## **5. AML/CTF Compliance Officer**

Angel Ridolfi, Principal Licensed Property Law Conveyancer, is responsible for all AML/CTF compliance obligations for Halo Conveyancing, including: oversight of Halo's AML/CTF Program (Part A and Part B); ensuring compliance with the AML/CTF Act, AML/CTF Rules 2025 and AUSTRAC guidance; approving and monitoring Reliance Agreements; ensuring KYC Information is collected, verified, stored, and managed appropriately; ensuring suspicious matter reporting obligations are met; ensuring staff training and internal controls are implemented; ensuring this Privacy Policy remains current and compliant. Angel may delegate operational tasks but retains ultimate responsibility.

## **6. What privacy law applies to our relationship**

Halo Conveyancing is a "small business operator" under s 6D of the Privacy Act and becomes subject to the Privacy Act from 1 July 2026 only in relation to AML/CTF-related activities under s 6E(1A).

## **7. How we collect Personal Information**

We collect Personal Information only by lawful and fair means, including: direct communication with you; email, phone, text, digital platforms; PEXA identity verification processes; documents you provide; information from authorised third parties. Your AML/CTF Program confirms:

“We are using InfoTrack’s AML solution to perform client due diligence...” We may also collect Personal Information through InfoTrack’s AML solution. We will provide a collection notice at or before the time of collection.

## **8. What Personal Information we collect**

We collect KYC Information required under the AML/CTF Act, including: identity information; beneficial ownership information; authority of persons acting on behalf of clients; PEP status; source of funds and wealth; transaction details. We may conduct ongoing monitoring.

## **9. What happens if you do not provide requested Personal Information**

We may be unable to provide Designated Services or comply with legal obligations; we may decline to act; we may cease to act or withdraw from the matter at our discretion.

## **10. Purposes of collection of Personal Information**

We collect and use Personal Information to: provide conveyancing services; comply with AML/CTF obligations; comply with NSW conveyancing legislation; comply with Duties Act requirements; comply with ARNECC Model Participation Rules.

## **11. Disclosure of Personal Information**

We may disclose Personal Information: with your express permission; to contracted service providers supporting AML/CTF due diligence; where required by law.

## **12. Third parties**

This includes InfoTrack’s AML solution, which supports: “Personnel due diligence... client due diligence... escalation... enhanced CDD...”

## **13. Reliance Agreements**

Halo Conveyancing may enter into Reliance Agreements with: lenders; mortgage brokers; real estate agents; buyer’s agents; other transaction partners. Under these agreements: each party remains responsible for its own AML/CTF obligations; reliance does not transfer liability; each party must rely on its own AML/CTF Program; Personal Information may be shared strictly for AML/CTF compliance; each party must independently assess adequacy of KYC Information.

## **14. Legal requirements**

We may disclose Personal Information: under warrant or subpoena; to law enforcement; to AUSTRAC without your knowledge or consent. We are prohibited from notifying you of disclosures to AUSTRAC.

### **15. Business transactions**

If Halo Conveyancing is involved in a merger, acquisition or asset sale, Personal Information may be disclosed in confidence.

### **16. How we protect your information**

We use: staff training; access controls; encryption; secure digital systems; firewalls and anti-virus software. We comply with the Notifiable Data Breaches scheme. AML/CTF KYC Information is retained for seven years.

### **17. Offshore access**

Some cloud services may process data offshore (e.g., Microsoft 365, Adobe Cloud, Google Cloud, Dropbox, DocUSign). These providers may only access data as required to deliver contracted services.

### **18. Access and correction**

You may request access or correction. Requests may be refused where permitted under the Privacy Act.

### **19. Complaints**

Complaints may be made to our Privacy Officer. If unresolved within 30 days, complaints may be escalated to the OAIC.

## **APPENDIX A — AML COLLECTION NOTICE**

**A1. Why we collect your information** Halo Conveyancing is required by law to collect, verify and manage certain personal information about you under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and AML/CTF Rules 2025.

### **A2. What information we collect**

We collect information necessary to establish your identity and meet our customer due diligence obligations. This may include: government-issued identification contact details date of birth residential address beneficial ownership information authority of persons acting on your behalf

source of funds and source of wealth information about the nature and purpose of your transaction.

### **A3. How we collect your information**

We collect information directly from you through: digital onboarding forms email, phone or other communication documents you provide identity verification processes (including PEXA requirements) Your AML/CTF Program confirms: “We are using InfoTrack’s AML solution to perform client due diligence...” We may also collect information through InfoTrack’s AML solution.

### **A4. Why we collect your information (expanded)**

We collect your information to: verify your identity assess and manage money laundering and terrorism financing risks comply with our obligations under the AML/CTF Framework comply with NSW conveyancing legislation provide conveyancing services conduct ongoing monitoring If you do not provide the information we request, we may be unable to act for you.

### **A5. Disclosure of your information**

We may disclose your information to: AUSTRAC InfoTrack’s AML solution third-party verification providers government agencies, regulators, courts or law enforcement other parties involved in your transaction (where permitted) We may enter into Reliance Agreements with your lender, broker, agent or buyer’s agent. Under these agreements: each party remains responsible for its own AML/CTF obligations reliance does not transfer liability information may be shared strictly for AML/CTF compliance We are prohibited from notifying you of disclosures made to AUSTRAC.

### **A6. Storage and security**

We store your information securely using physical, technical and administrative safeguards. Some digital services we use may process data offshore. AML/CTF records are retained for seven years.

### **A7. Access and correction**

You may request access to, or correction of, your personal information. Requests may be refused where permitted under the Privacy Act.

### **A8. Contact**

Halo Conveyancing

(02) 8551 3110

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Liability limited by a scheme approved under Professional Standards Legislation

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