



PRIVACY POLICY

1. DEFINITIONS AND INTERPRETATIONS

1.1 Definitions

In this Privacy Policy, unless the context otherwise requires:

- (1) **we/us/our** means Life Legacy Legal Pty Ltd ABN 16 675 464 114;
- (2) **Personal Information** has the meaning given to it in the Privacy Act;
- (3) **Permitted General Situation** has the meaning given to it in the Privacy Act;
- (4) **Permitted Health Situation** has the meaning given to it in the Privacy Act;
- (5) **Privacy Act** means the *Privacy Act 1988 (Cth)*; and
- (6) **Sensitive Information** has the meaning given to it in the Privacy Act; and
- (7) **you** means a natural person.

1.2 Interpretation

In this Privacy policy, unless the context otherwise requires:

- (1) a reference to:
 - (a) one gender includes the other genders;
 - (b) the singular includes the plural and the plural includes the singular;
 - (c) a person includes a natural person, partnership, body corporate, joint venture, association, government, authority, agency or other entity;
 - (d) a party includes that party's executors, administrators, successors and permitted assigns;
 - (e) a document is to that document as amended, novated or replaced from time to time;
 - (f) 'including' and similar expressions are not words of limitation; and
 - (g) a statute, regulation or provision of a statute or regulation ('Statutory Provision') includes:
 - (i) that Statutory Provision as amended or reenacted from time to time; and
 - (ii) a statute, regulation or provision enacted in replacement of that Statutory Provision or, if relevant, the predecessor to that statute, regulation or provision;
- (2) where a word or expression is given a particular meaning, other parts of speech and grammatical forms of that word or expression have a corresponding meaning;
- (3) if a party consists of more than one person, this Privacy Policy applies to them jointly and each of them severally;
- (4) headings are for convenience only and do not affect the interpretation or form part of this Privacy policy; and
- (5) words defined in the Privacy Act have the same meaning in this Privacy Policy.



2. RESPECTING YOUR PRIVACY

- (1) This Privacy Policy explains how we:
 - (a) handle your Personal Information;
 - (b) manage Personal Information provided to us or collected by us; and
 - (c) can be contacted if you have any privacy concerns about your Personal Information.
- (2) We are bound by the Australian Privacy Principles contained in the Privacy Act.

3. WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT?

- (1) We may collect different types of Personal Information about you. In addition to the types of information listed below we may collect from you, we may collect and hold Personal Information about you that is reasonably necessary for one or more of our functions or activities.
- (2) The kinds of Personal Information we collect and hold about you could include:
 - (a) identification information such as your:
 - (i) name;
 - (ii) address;
 - (iii) email address;
 - (iv) telephone numbers;
 - (v) date of birth; and
 - (vi) occupation;
 - (b) other information we consider necessary for the provision and promotion of our products and services and the operation of our business;
 - (c) financial details;
 - (d) photographs, film and/or recordings or any other digital representation;
 - (e) health information;
 - (f) relationship information;
 - (g) family information;
 - (h) device information, such as which browser you use, your operating system language and how you use your device; and
 - (i) your location or activity including IP address and geolocation data based on the GPS on your mobile device (when accessing our services) and whether you have accessed third party sites.

4. WHAT SENSITIVE INFORMATION DO WE COLLECT?

We may only collect Sensitive Information about you with your consent (unless the collection of such information without obtaining your consent is required or authorised by or under an Australian law or a court/tribunal order or a Permitted General Situation or Permitted Health Situation exists) and which is reasonably necessary for one of our functions or activities.

5. WHEN THE LAW AUTHORISES OR REQUIRES US TO COLLECT INFORMATION

We may collect Personal Information about you because we are required or authorised by an Australian law or court or tribunal order to do so. We will endeavour to tell you if this is the case and let you know the details of the law, court or tribunal order.



6. HOW DO WE COLLECT AND HOLD YOUR PERSONAL INFORMATION?

- (1) We assume, unless you tell us otherwise, you consent to the collection of Personal Information and Sensitive Information you provide to us (either directly or indirectly) for use and disclosure by us in accordance with this Privacy Policy.
- (2) **Personal Information collected by us:** We collect Personal Information in a number of ways. For example, we generally collect Personal Information directly from you such as through the completion of forms, face-to-face meetings and interviews, emails, telephone calls, digital devices and other electronic means. In addition, when you use our website, we may collect information about your IP address, location or activity.
- (3) **Personal Information collected from third parties:** In some circumstances, we may collect Personal Information about you from a third party. For example, we may collect information about you from:
 - (a) a public register;
 - (b) a relative;
 - (c) an associate;
 - (d) another advisor, including:
 - (i) an accountant;
 - (ii) a financial planner;
 - (iii) an insurer;
 - (iv) a broker;
 - (v) a lawyer;
 - (e) a health professional, including, a doctor, psychologist, psychiatrist and counsellor;
 - (f) another expert;
 - (g) a referee; and
 - (h) a referrer.
- (4) We may combine Personal Information we collect from you with Personal Information we collect from third parties.
- (5) **Anonymity:** If it is lawful and practicable to do so, you may deal with us anonymously or by using a pseudonym, for example, when you make a general enquiry to us. However, in some cases where it is unlawful or impracticable for us to deal with you without you identifying you or if you are using a pseudonym and you do not identify yourself, we may not be able to deal with you.

7. HOW WILL WE USE THE PERSONAL INFORMATION YOU PROVIDE?

We collect, hold, use and may disclose Personal Information so we can:

- (1) provide information;
- (2) provide services;
- (3) advance your matter;
- (4) respond to your enquiries, requests and complaints, conduct market research and take any required legal action;
- (5) identify you or verify your authority to act on behalf of an entity dealing with us;
- (6) run our business and perform administrative, legal and operational tasks;



- (7) conduct marketing and business development;
- (8) comply with our obligations under applicable laws, regulations and codes.

8. WHAT WILL WE DO IF WE RECEIVE PERSONAL INFORMATION WE DID NOT ASK FOR?

- (1) If we receive unsolicited Personal Information, we will endeavour to, within a reasonable period of receiving such information, determine whether the information is relevant for our functions or activities and whether we are permitted or required to retain it and, in doing so, we may use or disclose the Personal Information for the purposes of making the decision or whether we should destroy it.
- (2) If we are required to retain the unsolicited Personal Information, we will endeavour to handle the Personal Information the same way as if we had collected the Personal Information.

9. WHAT IF YOU DO NOT WANT TO PROVIDE US WITH YOUR PERSONAL INFORMATION?

If we do not collect your Personal Information or you do not provide your Personal Information to us, we may not be able to:

- (1) provide you with information, a service or a product;
- (2) manage or administer legal services to you;
- (3) verify your identity;
- (4) progress your matter; or
- (5) carry out one or more purposes for which we collect, use, hold and disclose personal information.

10. WHO MIGHT WE DISCLOSE PERSONAL INFORMATION TO?

- (1) We may use your Personal Information to send you information and publications (such as newsletters and magazines, websites and social media platforms). You can contact us at any time (see details below) if you no longer wish to receive marketing or publication materials from us.
- (2) There are a range of people and organisations to whom we may disclose Personal Information. The party to which we disclose Personal Information will depend on the dealings you have with us. For example, we may disclose Personal Information held about you to:
 - (a) an organisation involved in debt collecting, including purchasers of debt;
 - (b) a person providing services to us;
 - (c) a recipient of our publications, such as newsletters and magazines, marketing and promotional material including on websites and through social media platforms;
 - (d) a service provider that maintains, reviews and assists with the development of our business, business systems, procedures and technology infrastructure, including testing or upgrading our computer systems, marketing, operational, professional and other services;
 - (e) another organisation involved in our normal business practices, including our agents, contractors, accountants, auditors, lawyers and other external advisers;
 - (f) a government or regulatory body;
 - (g) a court or tribunal;
 - (h) another party to a matter you are involved in;
 - (i) a barrister;



- (j) an expert;
 - (k) a mediator;
 - (l) an arbitrator or dispute resolution participant;
 - (m) a health professional;
 - (n) a buyer of our business or part of our business;
 - (o) a successor or assign of ours;
 - (p) your other advisors, including your accountant, financier, broker, insurer or financial planner;
 - (q) anyone you authorise us to disclose information to; or
 - (r) anyone to whom we are required to or authorised to disclose the information to by law.
- (3) **Sending information overseas:** we may disclose Personal Information about you to overseas recipients, for example, when storing Personal Information with technology service providers that are situated outside Australia. We will endeavour to only disclose Personal Information to overseas service providers when it is necessary for the services they provide to us.
- (4) The countries in which these overseas service providers are likely to be located is:
- (a) United States of America;
 - (b) United Kingdom;
 - (c) Asia Pacific;
 - (d) Germany;
 - (e) Japan; and
 - (f) Canada.

11. MANAGEMENT AND SECURITY OF PERSONAL INFORMATION

- (1) We mostly hold Personal Information electronically in our IT systems, secure servers and databases, but we also may hold Personal Information in paper records.
- (2) We may store Personal Information physically or electronically with third party storage providers.
- (3) The security of your Personal Information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure, including by:
 - (a) maintaining appropriate document storage and data security policies;
 - (b) taking reasonable steps so access to personal information is only provided to authorised persons; and
 - (c) password access rights to computerised records.
- (4) Our employees are also required to respect the confidentiality of Personal Information.
- (5) If we hold Personal Information we no longer need and we are not required by law to keep it, we will endeavour to destroy or deidentify the Personal Information.

12. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- (1) You can request access to any Personal Information which we hold about you and request us to correct any inaccuracies in Personal Information we hold about you by making a request in



writing to our privacy officer (see details below). We will endeavour to respond to a request to access your Personal Information within a reasonable period after the request is made.

- (2) We will require you to verify your identity and specify what Personal Information you require. We cannot give you information about anyone else.
- (3) Making a request is free, however, we may charge a reasonable fee to cover the cost of verifying your identity and requesting and locating, retrieving, reviewing and copying any material requested. The fee will not be excessive, and we will endeavour to confirm the likely cost in advance.
- (4) We will endeavour to allow access or make the changes requested by you to your Personal Information unless we consider the Privacy Act or another relevant law requires us to withhold the information or not make the changes. If we cannot provide you with access to that information, we will endeavour to provide you with written notice explaining the reasons for refusal. If we refuse you access or to correct your Personal Information, you can make a complaint about this by following the complaint procedures in this Privacy Policy (see details below).
- (5) The Privacy Act permits an organisation to deny access to Personal Information in certain circumstances, including where giving access would have an unreasonable impact on the privacy of other individuals.
- (6) Please contact us if your contact details change or if you believe we hold incorrect information about you.

13. ENQUIRIES AND COMPLAINTS

- (1) If you would like further information about the way we manage the Personal Information we hold or if you believe we have breached the Australian Privacy Principles, please contact:

Privacy Officer
PO Box 21
SANDGATE QLD 4017

- (2) We will endeavour to investigate any complaint and respond to you as soon as we can. We will endeavour to try to do this within ten working days of receiving your complaint. If this is not possible, we will endeavour to contact you and let you know when we will respond to your complaint. We will endeavour to notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.
- (3) We will endeavour to deal with all complaints fairly and promptly, however, if you are not satisfied with our response to your complaint, you can refer your complaint to the Office of the Australian Information Commissioner (in writing):

Office of the Australian Information Commissioner (OAIC)
GPO Box 5218
SYDNEY NSW 2001
1300 363 992
enquiries@oaic.gov.au

14. USING OTHER WEBSITES

Our website may contain links or references to other websites to which this Privacy Policy may not apply. You should review the Privacy Policy of each of those websites and assess whether those policies are acceptable to you before using those websites.



15. CHANGES TO THIS PRIVACY POLICY

- (1) We may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate.
- (2) Any changes to our Privacy Policy will be published on our website.
- (3) This Privacy Policy was last updated on 30 September 2024.

