LEVERAGE
SOLICITORS

Privacy Collection Notice – AML / CTF

Leverage Solicitors

Version 1.0 – June 2026

Privacy Collection Notice

Privacy collection notice for customer due diligence

This privacy collection notice from Leverage Solicitors outlines why we collect your personal information, what we collect, how we collect it and who we share it with.

Why we need to collect your information

We 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 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.

What personal information we collect

We collect the following types of personal information:

- your full name, date of birth, residential address, location, contact details, job titles
- photo ID and unique identifier, such as a passport or driver's licence number
- Services and transactions obtained, offered and supplied usage history, including usage history, including information about the time, place, and circumstances of our interactions with you.

We 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

How we collect your information

We will generally collect your personal information directly from you (the subject of the information) unless:

- you have consented to collection of your Personal Information from a third party,
- it is unreasonable or impractical to make a direct collection; and/or
- we are required or authorised by law to collect your information from a third party.

We may collect Personal Information when you, your organisation, or those acting on your or your organisation's behalf:

- visit us or meet with our representatives;
- communicate with us, including by physical post, email, social media, telephone or text message;
- register to attend, present at or otherwise participate in a meeting, conference or event hosted or presented by us; and/or
- engage us to provide services including when you supply KYC Information in response to our direct request.

If we use a **credit reporting body for electronic identity verification**, **we will seek your express consent prior to doing so** and offer an alternative means of verification (for example, certified copies of identification documents), as legally required.

Who we may share your information with

Subject to legal requirements, we do not share your Personal Information with any third parties except:

- with your express permission; and
- to contracted service providers to organise or facilitate the efficient and effective administration, management or delivery of our services. This may include service providers that support our due diligence processes associated with complying with our AML/CTF obligations.

We will ensure that such service providers commit to protecting your Personal Information appropriately and agree not to use or disclose your Personal Information for any other purpose (other than as required by law). Some electronic services we use (InfoTrack, LEAP) may make the data accessible offshore (Vietnam, United States, Canada, the United Kingdom, Ireland, Poland, and New Zealand), but those services are not entitled to access or use the Personal Information held by us except as required for delivery of the contracted service.

Nothing in our Privacy Policy limits our obligations of confidentiality or client legal privilege. However, there may be circumstances where we are compelled to disclose confidential information to AUSTRAC under the AML/CTF Framework.

We are prohibited from notifying you of disclosures to AUSTRAC and may be prohibited from notifying you of disclosures to other government agencies or authorities.

If we are involved in a merger, acquisition or asset sale, your Personal Information may be disclosed in confidence as part of a due diligence process and may be transferred to the new owner. We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy.

What happens if we cannot collect your information

If you do not provide requested Personal Information, we may be unable to verify your identity and provide Designated Services and/or comply with our legal obligations.

Your privacy rights and our privacy policy

Our Privacy Policy contains further information about how we will handle your personal information and how you can access and correct your personal information. It also outlines how to lodge a complaint and how that complaint will be managed if you are concerned about how we handled your information.

How to contact us about your privacy

You can contact our Privacy Officer by email at info@leveragegroup.com.au.

Version Control

Item	Summary of update	Version	Review date
1	New comprehensive document to comply with the Privacy Act 1988 (Cth) in regard to anti-money laundering and counter-terrorism financing.	1.0	12/06/2026

Legislation	Privacy Act 1988 (Cth) Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
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Approved by	Bailey Compton, Principal Solicitor
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