	JOANNE PATRICIA BELFANTI trading as CITY & COUNTRY CONVEYANCING ABN: 39 407 506 847

1. About this policy

Joanne Patricia Belfanti trading as City & Country Conveyancing ABN 39 407 506 847 takes the protection of personal information seriously. This Privacy Policy explains how we collect, hold, use and disclose personal information in connection with our conveyancing services. It is prepared in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). In this policy, "AML/CTF Act" means the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

As a small business reporting entity under s 6E(1A) of the Privacy Act 1988 (Cth), this practice is subject to the Privacy Act in connection with its AML/CTF obligations. This policy covers personal information handled in connection with conveyancing matters, including personal information collected simultaneously for AML/CTF and conveyancing purposes, which describes most client identity and verification records. Personal information handled for business activities entirely unrelated to AML/CTF obligations and conveyancing matters is not covered by the Privacy Act for small business operators, but may remain subject to applicable legislation and professional obligations.

This policy applies to personal information we collect about our clients and other individuals involved in their property transactions. References to "you" in this policy include those individuals where the context permits. It should be read alongside our Privacy Collection Notice, which is provided to clients at the start of their matter.

Under APP 2, individuals may interact with us anonymously or using a pseudonym where this is lawful and practicable. However, this is not possible where we are required to verify identity under the AML/CTF Act or applicable conveyancing legislation. Due to these legal obligations, it is not practicable for us to provide conveyancing services to individuals who have not identified themselves.

2. Who we are

Joanne Patricia Belfanti trading as City & Country Conveyancing is a licensed conveyancing practice operating in New South Wales. We provide conveyancing and property settlement services to individuals and entities buying, selling and transferring real property.

Our privacy contact is Joanne Patricia Belfanti,Licensed Conveyancer. You can reach us at office@cityandcountryconveyancing.com.au or 02 6334 2565.

3. What personal information we collect

We collect personal information that is reasonably necessary to provide conveyancing and property settlement services. This includes:

- full name, date of birth and residential address
- contact details, including phone number and email address
- identification documents, such as driver's licence and passport details
- identity verification data, including facial images or biometric data, which may be collected directly from you by a third-party identity verification service we engage for this purpose (see Section 4)
- financial account and payment details relevant to your property settlement
- details of the property being bought, sold or transferred
- information about your personal circumstances where relevant to your matter, such as information relating to a deceased estate or a relationship breakdown
- details of other persons involved in your matter, such as a co-purchaser, co-vendor, mortgagee or beneficiary
- sensitive information collected for AML/CTF compliance purposes, which may include information about your political opinions or membership of a political association where required to assess whether you are a politically exposed person (PEP), and information about your criminal record where relevant to AML/CTF risk assessment (see Section 4)

We collect only the personal information we reasonably need. We do not collect personal information indiscriminately.

4. Sensitive information

Some of the information we collect, or that is collected on our behalf, is sensitive information under the Privacy Act 1988 (Cth). This may include: biometric data such as a facial image, collected as part of the identity verification process; information about political opinions or membership of a political association, collected where required to assess whether you are a politically exposed person (PEP) under our AML/CTF obligations; and information about criminal record where relevant to AML/CTF risk assessment.

We collect sensitive information only where it is reasonably necessary for your conveyancing matter. In most cases, we will seek your consent before collecting sensitive information. However, in some cases we may collect sensitive information without consent where collection is required or authorised by law, including under the AML/CTF Act, for example where collection is necessary to assess PEP status or conduct sanctions screening. Where we collect sensitive information on this basis, we will generally tell you at the time of collection.

We take additional steps to protect sensitive information and handle it in accordance with our obligations under the APPs.

Where we rely on your consent to collect sensitive information, including biometric or identity verification data, you may notify us at any time that you wish to withdraw that consent. Please note, however, that we are required by law, including under the Electronic Conveyancing National Law, the Australian Registrars' National Electronic Conveyancing Council (ARNECC) Model Participation Rules and applicable state conveyancing legislation, to retain evidence of verification of identity for at least seven years from the date of lodgement of the relevant registry instrument. This obligation exists independently of your consent and cannot be overridden by a withdrawal of consent or a request for erasure. Where personal information is not subject to a mandatory legal retention obligation, we will

give effect to a withdrawal of consent as soon as reasonably practicable after receiving your request. Withdrawal of consent in relation to identity verification may affect our ability to continue to provide conveyancing services to you.

5. How we collect your information

We collect most of your personal information directly from you during the onboarding process, by phone, email or in person.

We may also collect information about you from third parties where this is necessary for your matter. Third-party sources may include:

- real estate agents
- financiers, lenders and mortgage brokers
- the other party's conveyancing or legal representative
- title insurers and settlement agents
- e-conveyancing platforms, including PEXA
- land registries and government agencies
- third-party identity verification providers: we may direct you to a third-party identity verification service to complete the identity verification process required by law. That service will collect your identity documents and may collect a facial image or biometric data directly from you. We take reasonable steps to select identity verification providers that handle your information in accordance with Australian privacy law. The provider also operates under its own privacy policy, which we encourage you to read.

Where we collect information about you from a third party, we take reasonable steps to ensure you are made aware of that collection.

6. Why we collect and use your information

We collect and use your personal information to:

- provide conveyancing and property settlement services to you
- verify your identity: we are required by law to verify your identity before providing conveyancing services to you
- prepare and lodge documents with land registries and government agencies
- communicate with third parties involved in your matter, including the other party's representative, your financier and real estate agents
- comply with our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), including: conducting customer due diligence and verifying your identity before providing designated services; monitoring transactions and making reports required by law to AUSTRAC (the Australian Transaction Reports and Analysis Centre); and meeting record-keeping obligations under that Act
- manage, administer and improve our practice, including maintaining records, managing files, improving internal processes and service delivery

- respond to your enquiries and manage our relationship with you
- contact you about our services where you have not opted out (see Section 13 if included)

We will not use or disclose your personal information for a purpose other than the purpose for which it was collected unless you have consented or an exception under the APPs applies.

7. Who we share your information with

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

- land registries and government agencies
- the other party's conveyancing or legal representative
- your financier, lender or mortgage broker
- real estate agents involved in your matter
- title insurers and settlement agents
- e-conveyancing platforms, including PEXA
- third-party identity verification providers
- AUSTRAC (the Australian Transaction Reports and Analysis Centre) and other 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 (see Section 8)

We will not sell your personal information to any third party.

We are prohibited by law from notifying you if we have made, or are considering making, a report to AUSTRAC under the AML/CTF Act. We may also be prohibited from disclosing the reasons for declining to answer certain questions or for refusing certain access requests. This is a legal obligation under section 123 of the AML/CTF Act and is not within our discretion.

Practice sale or transfer: If our practice is sold, merged or transferred, your personal information may be disclosed in confidence as part of a due diligence process and may transfer to the new owner as part of the transaction. We will take reasonable steps to notify you before your personal information becomes subject to a different privacy policy.

8. Offshore storage and processing

We may use cloud-based software and AI tools to manage our practice. Some of these tools may store or process personal information on servers located outside Australia. This means your personal information may be held or processed in another country.

We take reasonable steps to ensure that offshore service providers handle your information in a way that is consistent with Australian privacy law. However, once your information is held offshore, it may be subject to the laws of that country, including laws that allow government agencies in that country to access it. Under Australian Privacy Principle 8, we remain accountable for the handling of your personal information by overseas recipients.

These providers may operate in countries including the United States, Ireland and other countries where cloud infrastructure is commonly hosted. Please ask us if you would like more information about the offshore providers we use.

9. How long we keep your information

We will keep your personal information contained for a minimum of seven years from the completion of your matter, in accordance with the *Conveyancers Licensing Regulation* and the Conveyancing Rules made by the Registrar General under Section 12E of the Real Property Act 1900 (NSW).

To protect your privacy and meet our compliance obligations under the *Privacy Act 1988* (Cth), the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), and the Conveyancing Rules, we apply a strict document retention and destruction protocol to your records:

- **Identity verification and compliance records:** All highly sensitive personal information collected solely for Verification of Identity (VOI), including copies of passports, driver's licences, birth certificates, and AML/CTF search results, will be held securely for a strict period of seven years. Upon the expiration of this mandatory seven-year statutory period, these specific identity documents and compliance data will be permanently and securely destroyed.
- **General Matter Files:** After the seven-year mandatory period has elapsed, we may continue to retain general file records, including correspondence, contracts and transfer documents, securely for the purpose of managing our legal and professional obligations. Files retained beyond the mandatory period are subject to periodic review and will be destroyed once they are no longer needed for that purpose.

We regularly review our electronic archives to ensure that any retained information is proportionate, secure, and limited strictly to what is necessary to manage legal risk.

10. How we protect your information

We take reasonable steps to protect the personal information we hold from misuse, interference, loss, and unauthorised access, modification or disclosure. Our security measures include:

- password-protected systems with access limited to authorised staff
- encrypted file storage and transmission where practicable
- staff training in privacy obligations and data handling
- physical security measures for any paper-based records

If we become aware of a data breach that is likely to result in serious harm to any individual, we will take immediate steps to contain the breach, assess the risk of harm, and notify the affected individual and the OAIC as required under the Notifiable Data Breaches scheme (Part IIIC, Privacy Act 1988 (Cth)).

11. Accessing and correcting your information

You have the right to request access to the personal information we hold about you, and to ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading.

To make a request, contact our privacy contact using the details in the "Contact us" section at the end of this policy. We will respond within a reasonable time and in a manner that meets your needs where possible.

We will not usually charge a fee for an access request, but we may charge a reasonable fee where the request requires significant time or resources to fulfil, or where a request is manifestly unfounded or excessive. We will tell you about any fee before proceeding. Additional restrictions on fees may apply to clients located in the UK, EU or EEA under the GDPR or UK GDPR.

There are limited circumstances in which we may refuse an access or correction request. If we refuse, we will give you written reasons and information about how to complain.

12. Our website and online data collection

If you visit our website cityandcountryconveyancing.com.au we may collect certain information automatically, including:

- your IP address and browser type
- the pages you visit on our website and the time spent on them
- the website that referred you to our site

We collect this information to understand how visitors use our website and to improve our online presence. We may use third-party analytics tools for this purpose, including tools that may process information outside Australia.

If you submit an enquiry through our website contact form, we collect the personal information you provide, such as your name and email address, to respond to your enquiry.

Our website may use cookies to improve your experience. You can configure your browser to refuse cookies, but doing so may affect the functionality of our website.

13. Keeping in touch

From time to time, Joanne Patricia Belfanti trading as City & Country Conveyancing may contact you with information about our services or matters we think may be relevant to you. We will only do so where you have consented or where we reasonably believe you would expect to receive such communications based on your existing relationship with our practice.

You may opt out of receiving marketing communications at any time by:

- contacting us at office@cityandcountryconveyancing.com.au using the unsubscribe option in any marketing communication we send you

We will process your opt-out request promptly and at no cost to you. Opting out of marketing communications will not affect our ability to contact you in relation to your conveyancing matter.

14. Changes to this policy

We may update this Privacy Policy from time to time to reflect changes in our practice, our technology or the law. The current version of this policy is available on our website at office@cityandcountryconveyancing.com.au and/or on request from our office.

Where we make a material change to this policy, we will take reasonable steps to notify affected clients, including by publishing the updated policy on our website.

15. Complaints

If you believe we have not handled your personal information in accordance with the Australian Privacy Principles, we encourage you to contact our privacy contact in the first instance. We take privacy complaints seriously and follow this internal process:

- **Acknowledgement:** We will acknowledge receipt of your complaint within seven days.
- **Investigation:** Our privacy contact will review the circumstances of the complaint, assess our compliance with the APPs and our internal procedures, and may contact you for further information.
- **Response:** We will provide you with a written response setting out the outcome of our review and any steps we propose to take within 30 days of receiving your complaint.

If you are not satisfied with our response, or if you do not wish to raise the matter with us directly, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

- **Website:** www.oaic.gov.au
- **Phone:** 1300 363 992

16. Clients located or resident in the United Kingdom, European Union or European Economic Area

If you are located in the UK, EU or EEA, or a resident of the UK, EU or EEA, please ask us for a copy of our GDPR Privacy Notice, which sets out your full rights and our obligations in more detail.

Please note that your personal information is held in Australia, which, as at the date of this policy, is not a country recognised by the EU as providing an adequate level of data protection. Where required, we rely on appropriate safeguards permitted under the GDPR, such as your explicit consent to the transfer, or the necessity of the transfer for the performance of a contract between you and us. We also handle your information in accordance with the APPs and take reasonable steps to protect it.

If you are located in the United Kingdom (UK), European Union (EU) or European Economic Area (EEA), or are a resident of the UK, EU or EEA, the EU General Data Protection Regulation (GDPR) or UK General Data Protection Regulation (UK GDPR), as applicable, may apply to the personal information we hold about you, in addition to the Privacy Act 1988 (Cth). In addition to your rights under Australian privacy law, you may have the following rights under the GDPR:

a. The right to withdraw consent: where we process your personal information on the basis of your consent, including consent to the processing of biometric or identity verification data under Article 9(2)(a) of the GDPR, you may withdraw that consent at any time by contacting us using the details in the "Contact us" section. Withdrawal of consent does not affect the lawfulness of any processing carried out before the withdrawal.
   Important: We are required under Australian law, including the Electronic Conveyancing National Law and ARNECC Model Participation Rules, to retain identity verification records for at least seven years. This is a legal obligation that applies regardless of any withdrawal of consent or request for erasure. If you do not accept this requirement, you must inform us as we may need to decline to act for you. Where information is not subject to such an obligation, we will give effect to a withdrawal of consent as soon as reasonably practicable.
b. the right to object to certain types of processing
c. the right to data portability
d. the right to restrict our processing of your personal information
e. the right to rectification of inaccurate or incomplete personal information
f. the right to erasure of your personal information in certain circumstances (however see paragraph (a) above for circumstances where this may not be possible)
g. the right to access the personal information that we hold about you

If you are a UK, EU or EEA resident, you also have the right to lodge a complaint with the relevant data protection authority (in the UK, the Information Commissioner's Office; in the EU or EEA, your local supervisory authority).

Clients with complex UK, EU or EEA privacy needs are encouraged to seek independent legal advice from an adviser with expertise in UK or EU privacy law.

17. Contact us

For any questions about this Privacy Policy or how we handle your personal information, please contact us:

Joanne Patricia Belfanti trading as City & Country Conveyancing

Privacy contact: Joanne Patricia Belfanti, Licensed Conveyancer

Email: office@cityandcountryconveyancing.com.au

Phone: 02 6334 2565

Website: cityandcountryconveyancing.com.au

This Privacy Policy is available at cityandcountryconveyancing.com.au and on request from our office. Last updated: ***1 July 2026***