

PRIVACY STATEMENT

1. Purpose

M Kley Pty Ltd (ABN 15 165 616 062) values and respects the privacy of the individuals and entities we deal with. We are committed to protecting personal information and complying with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act) and other applicable laws and regulations.

This Privacy Policy explains how we collect, use, store, disclose and manage personal information in connection with the conveyancing and property transaction services we provide.

This Policy may be updated from time to time to reflect changes in legislation, regulatory guidance, technology systems and business operations.

2. Privacy Officer

Monica Kley is the nominated Privacy Officer responsible for:

- overseeing compliance with this Privacy Policy
- responding to privacy enquiries and complaints
- overseeing privacy risk management
- managing data breach responses
- ensuring staff are appropriately trained in privacy obligations
- reviewing and updating this Policy as required

3. What is Personal Information?

“Personal information” has the meaning given in the Privacy Act 1988 (Cth) and generally means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not.

This may include information that identifies you directly or indirectly.

Sensitive information is a subset of personal information and may include information relating to racial or ethnic origin, biometric information, criminal history or other information protected under privacy legislation.

4. What Personal Information We Collect

The personal information we collect depends on the nature of the transaction and our dealings with you.

The information we may collect includes:

- full legal name
- residential, postal or business address
- date of birth
- telephone number
- email address
- driver’s licence, passport and other identification documents
- verification of identity and verification of authority information
- property and transaction details
- financial and banking information required for settlements or transactions
- trust or company information
- information required for AML/CTF compliance obligations

- information required by government authorities or electronic conveyancing systems
- communications and correspondence with us
- any other information reasonably necessary to provide our services or comply with legal obligations

Where required by law or reasonably necessary, we may also collect sensitive information.

We only collect sensitive information

- with your consent
- where required or authorised by law
- where reasonably necessary to perform our services or comply with regulatory obligations

5. How We Collect Personal Information

We collect personal information directly from you when you:

- engage us to provide conveyancing or related services
- communicate with us by phone, email or in person
- provide documents or forms to us
- complete verification of identity processes
- use electronic signing or verification platforms
- interact with our website or online systems

We may also collect personal information from third parties including:

- lenders and financial institutions
- mortgage brokers
- real estate agents
- solicitors and conveyancers
- accountants
- government departments and land registries
- electronic conveyancing platforms
- verification of identity providers
- publicly available records and databases
- regulatory bodies

6. Why We Collect, Hold and Use Personal Information

We collect, hold and use personal information to:

- provide conveyancing and property transaction services
- verify identity and authority
- comply with AML/CTF obligations
- conduct customer due diligence
- complete settlements and related transactions
- communicate with clients and relevant parties
- comply with legal, regulatory and professional obligations
- maintain internal records and administration
- protect against fraud, unlawful activity or security risks
- respond to enquiries, complaints or disputes
- improve our systems and services

We only collect personal information that is reasonably necessary for our functions and activities.

7. Disclosure of Personal Information

We may disclose personal information where reasonably necessary in connection with our services or where required or authorised by law.

This may include disclosure to:

- banks and financial institutions
- electronic conveyancing platforms
- verification of identity providers
- real estate agents
- solicitors and conveyancers
- government agencies and regulators
- courts or tribunals
- information technology providers
- cloud storage and backup providers
- professional advisers including accountants, insurers and legal advisers
- contractors or service providers assisting with our operations

We may also disclose information where required under the AML/CTF Act or other applicable legislation.

8. Overseas Disclosure

Some third-party providers engaged by M Kley Pty Ltd may use cloud-based infrastructure or data processing systems located within or outside Australia.

Where personal information is disclosed overseas, we will take reasonable steps to ensure appropriate privacy and security protections are in place.

9. Storage and Security of Personal Information

M Kley Pty Ltd takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Security measures may include:

- secure office premises and physical file controls
- password-protected systems and devices
- role-based access restrictions
- cloud-based backup systems
- anti-virus and email protection software
- monitoring and threat protection systems
- secure electronic conveyancing systems
- external IT support and recovery services
- staff training regarding privacy and cyber security obligations

M Kley Pty Ltd currently uses:

- CATS conveyancing software
- Livesign verification systems
- Realtime conveyancing software
- Acrobat Reader

Last reviewed and updated: 18 May 2026

- EASY AML verification systems
- Microsoft office word and other systems
- Microsoft OneDrive backup and cloud storage systems
- approved third-party electronic conveyancing and identity verification providers

M Kley Pty Ltd may also use other approved electronic conveyancing, customer due diligence, document management and cloud-based service providers in connection with property transactions and AML/CTF compliance requirements.

10. Data Breach Response

M Kley Pty Ltd has processes in place to identify, assess and respond to suspected data breaches.

Where a data breach is likely to result in serious harm, we will:

- take immediate steps to contain and assess the breach
- investigate the nature and scope of the incident
- notify affected individuals where required
- notify the Office of the Australian Information Commissioner or other regulators where required by law
- review and improve systems and processes following the incident

Staff are required to immediately report any suspected privacy or cyber security incidents to the Privacy Officer.

11. Retention and Destruction of Personal Information

M Kley Pty Ltd retains personal information for as long as reasonably necessary to:

- provide services
- comply with legal obligations
- satisfy AML/CTF record keeping requirements
- manage disputes, claims or investigations
- maintain appropriate business and professional records

Where information is no longer required, M Kley Pty Ltd will take reasonable steps to securely destroy or de-identify the information in accordance with legal and regulatory obligations.

M Kley Pty Ltd retains records for the periods required by applicable laws, including AML/CTF and conveyancing obligations. Certain records may be retained for a minimum of 7 years. Where full identification documents are no longer required, M Kley Pty Ltd will take reasonable steps to securely destroy or de-identify them in accordance with privacy obligations.

12. Access and Correction

You may request access to personal information we hold about you and request corrections where required.

We may require proof of identity before processing a request.

Requests should be made in writing to the Privacy Officer using the contact details below.

We will respond within a reasonable period.

In some circumstances, access may be refused where permitted by law.

13. Privacy Enquiries and Complaints

If you have an enquiry about how M Kley Pty Ltd handles your personal information, would like to request access to or correction of your personal information, or believe we have breached privacy laws or mishandled your personal information, you may contact us using the details below.



0412 538 103

monica@mkley.com.au

www.mkley.com.au

Privacy enquiries and complaints should be directed to the Privacy Officer.

We may require proof of identity before processing certain requests.

We will acknowledge enquiries and complaints promptly and respond within a reasonable period.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC):

<https://www.oaic.gov.au>

14. Contact Details

Privacy Officer

Monica Kley

M Kley Pty Ltd

Email: Monica@mkley.com.au

Phone: 0412 538 103

15. Staff Responsibilities

All staff and contractors of M Kley Pty Ltd are required to:

- comply with this Privacy Policy
- protect confidential and personal information
- report privacy or cyber security concerns immediately
- complete privacy and cyber security training where required
- only access personal information necessary for their role

16. Privacy Risk Management

M Kley Pty Ltd maintains processes for identifying, recording and managing privacy risks and issues associated with its operations, systems and AML/CTF obligations.

Privacy risks, incidents and improvement actions are recorded within an internal Privacy Risk and Issues Register maintained by the Privacy Officer.