

Privacy Policy

Allen & Overy values your privacy and cares about the way in which your personal information is treated.

This statement describes:

1. what personal information we collect about you
2. how we obtain your personal information
3. how and on what basis we use your personal information
4. how long we keep your personal information
5. who we share your personal information with
6. how we protect your personal information
7. which countries we transfer your personal information to
8. your rights regarding your personal information
9. who are the data controllers
10. changes to our privacy policy
11. who to contact with questions or concerns

Allen & Overy refers to Allen & Overy LLP, its subsidiaries and other partnerships, corporations, undertakings and entities which are authorised to practice using the name 'Allen & Overy'. See the section entitled '**Data controllers**' below for more information on the entity that controls and processes personal data.

1. What personal information do we collect about you?

In this privacy policy, we use the term personal information to describe information that is about you, and which identifies you.

In relation to your use of the Australian Financial Services Licence Navigator (the **Portal**), we will collect the following personal information:

- Basic information about you (your first and last name and the name of the organisation you are using the Portal on behalf of)
- Contact information (your email address and telephone number)
- The country you are located in
- Technical information relating to your use of the Portal (the date and time your session on the Portal started)
- Any other information relating to you which you may provide to us, or which is otherwise provided to us or generated by us, in the course of your use of, or the operation of, the Portal.

You are responsible for ensuring that the personal information you provide to us complies with applicable data protection laws and you will not do or omit to do anything that would cause Allen & Overy to be in breach of those laws.

2. How we obtain your personal information

We collect your personal information:

- directly from you:
 - in the course of your use of the Portal, including all information that you submit through the Portal;
 - when you provide information to us, or interact with us directly, for instance engaging with our staff; and
 - when you contact or communicate with us (including by email or otherwise); and
- while monitoring the Portal.

If we do not collect, or you do not provide, your personal information to us, we may not be able to provide our products and services to you.

3. How and on what basis we use your personal information

We have set out below the purposes for which we use your personal information and the legal basis under the EU General Data Protection Regulation (**GDPR**) that we rely on to process your information.

Purpose	Legal Basis
To provide the Portal to you	For our legitimate business purposes (the provision of the Portal) and, depending on the circumstances, to perform a contract between you and us
To send you information you have asked for and to respond to your communications	For our legitimate business purposes (the provision of the Portal and any other services requested by you) We may request your consent in circumstances where required
To manage and administer our relationship with you	For our legitimate business purposes (including the provision of the Portal)
To promote the Portal	For our legitimate business purposes (the promotion of the Portal and related services) We may request your consent in circumstances where required

Purpose	Legal Basis
To audit and monitor the use of the Portal	For our legitimate business purposes (the provision of the Portal, as well as to improve and ensure the security of the Portal and related services) We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law
To compile aggregated and anonymous statistics about the use of the Portal	For our legitimate business purposes (to provide and improve the Portal and other services of Allen & Overy and inform marketing activities in relation to the Portal and other services of Allen & Overy)
To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims	For our legitimate business purposes (such as establishing, exercising or defending legal claims) and for compliance with legal obligations to which we are subject

4. How long we keep your personal information

Your personal information will be retained for a period of two years following your use of the Portal for the purposes set out above and in case of legal proceedings. We will retain aggregated and anonymised statistical information in relation to the use of the Portal after this period. Individuals will not be identifiable from this information.

5. Who we share your personal information with

Your personal information will be shared with Allen & Overy LLP as the controller of Allen & Overy's main IT systems. In addition, we are an international law firm and any information that you provide to us may be shared with and processed by any entity in the worldwide network of Allen & Overy and our associated firms. You can see a list of our offices at <http://www.allenoverly.com/locations/>.

We may also share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including IT and other service providers to Allen & Overy. The Portal is powered by our service provider Microsoft. When we engage a third-party service provider to collect or otherwise process personal information on our behalf, the third party is selected carefully and will be required to have appropriate security measures in place.

Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your information to new Allen & Overy entities or to third parties through which the business of Allen & Overy will be carried out.

If you separately access www.allenoverly.com or use our legal services, we will process your information as set out in the privacy policy on the website, which is available by clicking [here](#) or via <https://www.allenoverly.com/en-gb/global/legal-notices/privacy-policy>.

We do not sell, rent or otherwise make personal information commercially available to any third party, except with your prior permission.

6. How we protect your personal information

We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

The information processed in the Portal is encrypted in transit (HTTPS/TLS 1.2) and at rest (AES-256). As set out above, Microsoft powers the Portal and its information security policies are aligned with the ISO 27001 standard. Microsoft conducts regular automated penetration scanning, network vulnerability assessments, internal audits and annual penetration testing of its systems.

7. Which countries we transfer your personal information to

The Portal is hosted in the European Economic Area (the “EEA”). Your data will also be processed in the country in which you are accessing the Portal.

In order to provide our services, we may need to transfer your personal information to locations outside the EEA or the jurisdiction in which you provide the information for the purposes set out in this privacy policy. Please see **‘Who we share your personal information with’** for more detail on how the information may be shared with Allen & Overy offices and third party service providers.

The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. EU standard contractual clauses (as contemplated by Article 46(2) of the GDPR) are in place between all Allen & Overy entities that share and process personal data. Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses. For more information about the measures in place, please contact us (see section below **‘Who to contact with questions or concerns’**).

8. Your rights regarding your personal information

The GDPR and other applicable data protection laws provide certain rights for data subjects.

You are entitled to request a copy of the information we hold about you and information about how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict or suspend our processing of that information, to object to our processing of your information and, in some circumstances, to request receipt or transmission to another organisation, in a machine-readable form, personal information relating to you that you have provided to us. Where we rely on your consent to process your personal information, you have the right to withdraw your consent at any time. You also have the right to lodge a complaint in relation to Allen & Overy's processing of your personal information with a local supervisory authority.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see '**How we use your personal information**') or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by email to AFSLN@allenovery.com.

9. Who are the data controllers

Allen & Overy (Australia) is the principal data controller. Depending on the location where legal or other services are provided, another undertaking or entity in the Allen & Overy group may be the data controller in relation to your personal data. Please visit <http://www.allenovery.com/legal-notice/country-specific/pages/default.aspx> for details of the Allen & Overy entity through which we practice law in each jurisdiction and, where necessary having regard to local applicable data protection or privacy laws, a country-specific privacy notice.

10. Changes to our Privacy Policy

This privacy policy may change from time-to-time and the updated policy will be posted on this page. The updated privacy policy will take effect as soon as it has been updated or otherwise communicated to you. The date of the last change will be indicated at the end of this document.

This privacy policy was last updated in November 2022.

11. Who to contact with questions or concerns

If you have questions, complaints or need further information about our privacy policy or practices, please contact our Chief Privacy Officer, using the details below:

Jennifer Brannigan

Chief Privacy Officer
Allen & Overy LLP
68 Donegall Quay
Belfast
Northern Ireland
BT1 3NL
Email: DataPrivacy@allenovery.com
Tel: +44 (0) 28 9060 7500