



One AML Privacy Policy

One AML Entities:

- One AML Audit Pty Ltd is an Australian company (number 66 643 926 658) with its registered office at 75 King St, Sydney, NSW 2000, Australia.
- One AML Limited is a New Zealand company (number 9429047147096) with its registered office at Level 4/1 Kenwyn Street, Parnell, Auckland, 1052, New Zealand.





1. Introduction

One AML Audit Pty Ltd (Australia) and One AML Limited (New Zealand) (together, "One AML," "we," "our," or "us") are committed to protecting the privacy of individuals and organisations whose information we handle. We provide independent Anti-Money Laundering (AML) audit, review, and compliance consulting services. We do not perform identity verification, KYC, KYB, or beneficial ownership checks. Instead, we review our clients' AML documentation and records to assess the effectiveness of their compliance frameworks. This policy outlines how we collect, use, store, and disclose personal information in accordance with the Australian Privacy Act 1988 (Cth) and the New Zealand Privacy Act 2020.

2. Scope

This policy applies to clients and prospective clients engaging One AML for AML audits, reviews, or advisory services; client representatives whose details may appear within AML documentation we review; and visitors to our websites or individuals contacting us by email, phone, or through online forms.

3. Information We Collect

We only collect personal information necessary for our professional services and business operations. Information provided by clients may include AML/CTF policies, procedures, and risk assessments, samples of customer files, staff roles, and compliance documentation. Clients are responsible for ensuring that we have lawfully collected any personal information they share with us. We also collect contact details, engagement correspondence, and limited technical data such as IP addresses and website analytics.

4. How We Use Personal Information

We use personal information only for legitimate business purposes, including delivering AML audits and reviews, evaluating client AML frameworks, communicating with clients, managing engagements, fulfilling legal obligations, maintaining records, and improving services. We do not use client data from AML files for unrelated purposes such as marketing or profiling.

5. Data Storage and Cloud Systems

One AML uses Google Workspace (formerly G Suite) and Google Drive as our primary platforms for capturing, storing, and managing client information. These systems are hosted by Google Cloud Platform and governed by Google's own security and compliance standards, including ISO 27001,



SOC 2/3, GDPR alignment, and encryption at rest and in transit. Google acts as a data processor providing infrastructure and storage services, while One AML remains the data controller responsible for information uploaded and used within those systems. Access is restricted to authorised personnel and reviewed periodically.

6. Legal Basis for Processing

We process personal information based on lawful bases such as performance of a contract, legitimate interests, legal obligations, and consent where applicable.

7. Disclosure of Information

We may share personal information with professional staff, contractors, service providers, regulators, insurers, or legal advisers where required. We do not sell or trade personal information. All providers, including Google, must maintain appropriate safeguards.

8. International Data Transfers

As One AML operates across Australia and New Zealand and uses Google's global cloud infrastructure, personal information may be stored or accessed outside your jurisdiction. We ensure compliance with privacy laws and adequate protections for all transfers.

9. Data Security

We apply layered security controls, including encryption, user authentication, endpoint protection, confidentiality agreements, and monitoring. While we rely on Google's enterprise security, we also maintain our own internal governance and procedures.

10. Data Retention

We retain personal information only as long as necessary to complete engagements, comply with legal obligations, or maintain business records. After this period, data is securely deleted or anonymised following Google Drive's retention protocols.

11. Your Rights

Depending on jurisdiction, you may have rights to access, correct, delete, restrict, or object to processing of your information, withdraw consent, or lodge a complaint with the relevant regulator.



12. Complaints and Contact Details

If you have concerns about your privacy or data handling, please contact us. One AML Audit Pty Ltd (Australia) and One AML Limited (New Zealand): contact@oneaml.io If unsatisfied, contact the OAIC in Australia or the Privacy Commissioner in New Zealand.

We also encourage you to seek further information about your rights from (and, where you think it necessary, complain directly to) the relevant privacy authority:

- If you are residing in New Zealand, at: <https://privacy.org.nz/your-rights/making-a-complaint/complaint-form/>
- If you are residing in Australia, at: <http://www.oaic.gov.au/privacy/privacy-complaints>

13. Updates to This Policy

We may update this policy periodically. Changes will be published on our website with an updated effective date. Continued engagement after changes indicates acceptance of the revised policy.