Cowell Clarke
COMMERCIAL LAWYERS

First AML - Information Handling FAQs

Cowell Clarke has partnered with specialist compliance platform, First AML, to collect/verify client information as required under the Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Act.

Q: WHAT SORT OF INFORMATION IS REQUIRED TO BE COLLECTED?

From 1 July 2026, Cowell Clarke is required to collect certain information to comply with the AML/CTF Act. As part of our regulatory obligations, we may collect Personal Information and/or Sensitive Information as defined under the Privacy Act, including through our specialist compliance platform, First AML. The information we are required to collect depends on whether you are an individual or acting on behalf of an entity. The information required may include the following (which is commonly known as **KYC information**):

- **Individuals**: your name, DOB and residential address which may be collected via government identification (e.g. driver's licence or passport) or other means (e.g. utilities bills) and your biometric data (a video of your face).
- **Entities (e.g. companies/trusts)**: individual information about directors, shareholders (including directors of shareholders), beneficiaries or trustees of trusts, or agents engaging us on behalf of the above.

In most circumstances, we are required to complete these checks before commencing your legal work.

Q: HOW IS INFORMATION COLLECTED BY FIRST AML?

If you are required to provide information as part of our AML/CTF regulatory obligations, then you or your relevant contact person will receive an email from Cowell Clarke's AML Team (ccaml@cowellclarke.com.au) containing one or more secure links to the First AML platform. First AML will collect your information as you complete the requests via the secure links.

Q: HOW DOES FIRST AML STORE YOUR INFORMATION?

Information collected via First AML is stored under the control of First AML and not Cowell Clarke.

First AML securely stores information and is certified with the International Organisation for Standardisation.

Information transmitted and stored via the platform is encrypted both in transit and at rest using industry standard encryption.

Information held by First AML is only stored on servers located in Australia. More information about First AML's Terms of Use and privacy information can be found on First AML's website.

Q: HOW LONG IS YOUR INFORMATION RETAINED?

First AML is configured to automatically delete copies of ID documents and biometric data 14 days after we have completed checks.

In accordance with our AML/CTF legal obligations, we retain ID document metadata (i.e. name, DOB, document number), verification results and other information (e.g. company or trust documents) for a longer period. That information is collected and stored in accordance with our Privacy Policy.

Q: WHERE CAN I LEARN MORE ABOUT HOW INFORMATION IS HANDLED?

More information about First AML's security protocols can be found on the First AML website. Please see our Privacy Policy for more details on how we handle personal information.

If you have any questions please do not hesitate to contact Cowell Clarke's AML Team at: ccaml@cowellclarke.com.au.