

Omni Bridgeway Privacy Statement 2019

This privacy statement provides information about how Omni Bridgeway and its group companies process personal data. For information about how our group company ROLAND ProzessFinanz AG processes personal data, please contact ROLAND at www.roland-prozessfinanz.de/en/ as they are the controller for the personal data they process.

1. Controller responsible for data processing

The controller responsible for the data processing is Omni Bridgeway B.V., Schiphol Boulevard 121, 1118 BG Schiphol, the Netherlands, and is referred to as 'we', 'us' etc. in this Privacy Statement.

2. Contact information

Please send any questions relating to personal data protection to notices@omnibridgeway.com.

3. The purpose of our data processing

We process personal data for the following purposes:

Purposes

- To communicate with contact persons (for example with clients and suppliers);
 - To review and evaluate litigation funding prospects and other potential agreements;
 - To determine whether we wish to enter into an agreement with a supplier or vendor;
 - To settle legal claims;
 - To conduct legal proceedings;
 - To perform contracts with our clients, including claim enforcement;
 - To perform contracts with our suppliers or vendors;
 - To administer and maintain commercial relationships with our contact persons;
 - To administer and archive case-related information;
 - To administer our finances and fulfil our legal obligations in this respect;
 - To protect our assets, business and personnel;
 - To carry out recruitment initiatives, including managing job applications, maintaining professional HR administration and determining whether to hire candidates;
 - To comply with requests, in the event that they arise, from competent government authorities.
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4. The legal basis for data processing

We process personal data on the following legal basis:

Legal basis

- The processing is necessary for the performance of a contract with the data subject or to take steps before entering into a contract; and/or
 - The processing is necessary for the purposes of our, or a third party's, legitimate interests; and/or
 - The processing is necessary to comply with our legal obligations;
 - For certain specific processing activities, such as sending email newsletters and retaining candidates' personal data for longer than four weeks, we ask for the data subject's prior consent.
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5. Legitimate interest

The legitimate interest in processing personal data derives from the purpose of our business activities, which include the evaluation and management of our client's legal claims as part of our funding and recovery services.

6. Recipients or categories of recipients

We may share personal data with the following categories of recipients:

Recipients / categories of recipients	Description
IT service providers	These service providers are located and store personal data in the EEA.
Suppliers such as lawyers, bailiffs, advisors, auditors and translators	We share personal data from our case files with suppliers who provide services on specific cases. Such suppliers are usually established in the country where the legal proceedings take place or are intended to take place; this can be anywhere in the world.
Courts / arbitral tribunals / arbitral institutes (jointly: 'courts')	We share personal data from specific case files with courts established in the country where the legal proceedings take place or are intended to take place; this can be anywhere in the world.
Clients	Clients may receive personal data contained in their case files.
Investment partners	Limited personal data contained in case files may be shared with investors for investment decisions related to our cases.

7. Transfer of data to third countries

In the context of our activities, we must sometimes transfer personal data to third countries:

Country	Safeguard / exception
Singapore and the United Arab Emirates	For transfers within the Omni Bridgeway group outside Europe, we have concluded Standard Contractual Clauses as adopted by the European Commission.
Switzerland	The European Commission has recognised Switzerland as providing an adequate level of personal data protection.
Other	As explained under 6. above, we may transfer personal data to recipients outside the EEA if this is necessary for the establishment, exercise or defence of legal claims. Depending on the specific case this can be anywhere in the world.

To receive a copy of the safeguards we have put in place, please use the contact details listed under 2. above.

8. Duration of data storage

Personal data will be stored for as long as is necessary given the purposes for which it was collected. We will use the following (maximum) retention periods, unless an applicable legal statute of limitation regime requires a longer retention period.

Personal data category	Retention Period
Personal data in active case files	Until the case is closed and archived (see below)
Personal data in archived case files	20 years from the date on which the case file is archived. If a case is reactivated and subsequently archived again, the retention period will be renewed
Personal data in financial administration	10 years from the relevant fiscal year
Contact details not included in case files	10 years from the year of last contact with the data subject
Personal data of candidates who do not enter into an employment agreement	4 weeks after the job application procedure is closed, or 12 months with the candidate's consent
Other personal data	5 years

9. Your rights

On the basis of the General Data Protection Regulation (GDPR), you have (at least) the following rights:

- to ask for access to your personal data;
- to have incorrect personal data corrected;
- to have incomplete personal data completed, taking into account the purposes for which they are processed;
- to have your personal data deleted or restricted;
- to object to the processing of your personal data;
- if you have given consent for a specific processing of your personal data, to withdraw that consent. The withdrawal of your consent shall apply to any subsequent processing of your personal data;
- if you have submitted personal data or if you have created them, and you have given your consent or the data are required for the conclusion and/or the performance of the agreement with you, and if the data are processed by automated means: you are entitled to receive your personal data in a structured, commonly used and machine readable form and, if technically feasible, to transfer those data in that manner to another party at your request;
- to submit a complaint with the competent data protection authority.

To exercise your rights, please contact us using the details listed under 2. above.

The GDPR contains several exceptions to the aforementioned rights, which may lead to a specific request being rejected.

10. Sources of personal data

We collect or receive personal data from the following sources:

Source	Category of personal data
Clients, counterparties and suppliers, such as lawyers, advisors and information service providers	Name, contact details, information related to our case files etc.
Public sources	Name, contact details, due diligence information, information relevant for our case files etc.

11. Provision of personal data

The provision of data is voluntary. However, to the extent that we require personal data to evaluate a legal claim, determine whether to enter into an agreement, carry out our duties under an agreement or comply with our obligations, the provision is mandatory in the sense that without the requested personal data, we reserve the right (i) not to enter into an agreement with the (legal) person in respect of which agreement the provision of personal data is required or (ii) to suspend or terminate any existing agreement in respect of which the provision of personal data is required but not provided.

12. Automated individual decision making

Omni Bridgeway does not engage in automated individual decision making.