

Omni Bridgeway Limited ("**Omni Bridgeway**", "**we**", "**our**" or "**us**") acknowledges that privacy is an important individual right and we are committed to respecting your privacy and protecting your personal information.

This Privacy Policy ("**Policy**") applies in relation to Omni Bridgeway's operations in Australia and explains how and why Omni Bridgeway collect, store, use and disclose your personal information when you: (i) visit our site, www.omnibridgeway.com or associated sites or pages (the "**Site**") or (ii) engage with us to use the products or services that we provide, including registering to receive updates from us (our "**services**"). For more information about how we handle personal information that is subject to the EU General Data Protection Regulation, please refer to our UK privacy policy.

Omni Bridgeway complies with the Australian Privacy Act 1988 (Cth) as updated and amended from time to time ("**Privacy Act**"). This Policy relates to the collection, storage and use of personal information that is covered by the Privacy Act, being information or an opinion relating to an individual which can be used to identify that individual. This Policy is not intended to cover information that is not covered by the Privacy Act.

You do not have to provide us with your personal information. But, if you do not provide us with the personal information that we need, we may not be able to provide our services in the manner requested or at all, or assistance to you or our clients on your behalf. By supplying us with your personal information, you are agreeing to be bound by this Policy.

Any amendments to this Policy will be notified to you by posting an updated version of the Policy on our website, www.omnibridgeway.com.

Background

Omni Bridgeway is a company listed on the Australian Securities Exchange (ASX: OBL) providing funding for high value legal claims and other related services.

Omni Bridgeway's principal activities are the investigation, management and funding of litigation and arbitration claims in Australia and other jurisdictions.

Omni Bridgeway has offices in Australia located in Adelaide, Brisbane, Melbourne, Perth and Sydney. Each of those offices has agreed to adhere to the provisions of this Policy. Omni Bridgeway also has offices in Singapore, Hong Kong, the United Kingdom, United States, Canada, The Netherlands, Switzerland, Germany and the United Arab Emirates. Please see further information on the Omni Bridgeway Group at www.omnibridgeway.com.

Collecting information about you

Omni Bridgeway generally collects personal information directly from you or your authorised

representative. For example, Omni Bridgeway may collect personal information about you when you deal with us over the telephone, send us correspondence (whether by letter, fax, e-mail or via the Omni Bridgeway website), request litigation funding via Omni Bridgeway's website or when a representative of Omni Bridgeway meets with you. If you contact us, Omni Bridgeway may keep a record of that contact. In some instances (including but not limited to where we have obtained your personal information via our website) your personal information may be provided to us by your authorised representative.

Generally, the type of information Omni Bridgeway collects and holds about clients, service providers (such as lawyers and experts) and other business contacts will include your name, mailing and email addresses, telephone number, job title and organisation/employer name. Depending on the nature of services being requested by or provided to you, Omni Bridgeway may also collect information relating to your financial standing.

In order to provide clients with our services, Omni Bridgeway also collects information relating to the legal proceedings for which funding is sought or being provided.

Omni Bridgeway does NOT collect sensitive personal information (such as information about your health, religion, or membership of a professional or trade association) unless it is reasonably necessary for the services Omni Bridgeway provides to you and you consent to the collection. If you provide us with sensitive personal information Omni Bridgeway will not use any sensitive personal information for a secondary purpose, unless you would reasonably expect the information to be used for the secondary purpose, and that secondary purpose is directly related to the primary purpose of collection.

If you do not provide Omni Bridgeway with the information requested, Omni Bridgeway may not be able to provide you with our services.

Omni Bridgeway may also source personal information from a third-party source. For example, Omni Bridgeway may collect personal information about you from a publicly maintained record or from the public domain generally (for example via the internet or media).

Using and disclosing your personal information

Omni Bridgeway collects, holds, discloses and uses your personal information to:

- provide our services and products to you;
- market our services and products to you (unless you have notified us that you do not wish to receive marketing material);
- keep you informed of legal and funding developments that may be of interest to you;
- notify you of events that Omni Bridgeway is holding;
- communicate with you;
- purchase goods and services from you;
- help us manage or improve our services;
- comply with legal obligations; and/or

- other purposes related to any of the above.

If you are a client or are employed or engaged by a client, Omni Bridgeway may disclose your personal information to:

- other companies or individuals who assist us in providing services or who perform functions on Omni Bridgeway's behalf;
- solicitors, barristers or any other experts engaged to provide you with services which Omni Bridgeway have agreed to fund; and
- anyone else to whom you authorise us to disclose it.

If Omni Bridgeway engages third parties to perform services for us, which involves the third party handling personal information that Omni Bridgeway holds, Omni Bridgeway prohibits the third party from using personal information about you except for the specific purpose for which Omni Bridgeway supplies it.

Omni Bridgeway does not disclose any personal information it collects to third parties for the purpose of allowing them to directly market their products and services. Omni Bridgeway does not sell or trade personal information.

Disclosure of personal information outside Australia

Omni Bridgeway may disclose your personal information to overseas persons or entities if the disclosure is required in order for Omni Bridgeway to provide its services to you. The countries in which such overseas recipients are located will depend on the circumstances of the services Omni Bridgeway provides you but are likely to include United Kingdom and United States of America. Where Omni Bridgeway discloses your personal information outside of Australia to a jurisdiction that does not have comparable privacy laws, Omni Bridgeway will ensure that your personal information is handled in accordance with the Australian Privacy Principles. Omni Bridgeway will take reasonable steps to ensure that any overseas persons or entities to whom any personal information is disclosed does not breach the relevant Australian Privacy Principles.

Accessing and correcting personal information Omni Bridgeway holds about you

You can contact Omni Bridgeway at any time to request access to your personal information or for your personal information to be corrected or updated. Please forward your request to our Client Liaison Team in Perth:

Telephone: 1800 016 464 (freecall within Australia) or +61 8 9225 2322

Address: PO Box Z5106, St George's Terrace, PERTH WA 6831

Fax: +61 8 9225 2399

Email: **privacy@omnibridgeway.com**

Unless an exception applies, Omni Bridgeway will, on request, at no charge and within 28 days provide you with access to the personal information Omni Bridgeway holds about you. Omni Bridgeway will provide you with access to your personal information in a manner requested by you, provided it is reasonable and practicable to do so.

If Omni Bridgeway is unable to provide you with access to the information, Omni Bridgeway will

provide you with reasons and inform you of any exceptions relied upon under the Privacy Act, for example that your request is unreasonable or relates to legal proceedings and may be privileged or that providing the information would be unlawful. Omni Bridgeway will also provide you with details of the process for making a complaint about the refusal to grant you access.

Omni Bridgeway will take appropriate steps to verify your identity (or verify that you act as a legal guardian or authorised agent of the individual concerned) before granting a request to access your personal information.

Omni Bridgeway will take reasonable steps to ensure that the personal information Omni Bridgeway collects about you is accurate, up-to-date, complete and relevant. Omni Bridgeway will also take reasonable steps to ensure that any personal information about you which Omni Bridgeway uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.

On request, Omni Bridgeway will correct your information within 28 days of the request and at no charge. Omni Bridgeway will take reasonable steps in the circumstances to notify any relevant third parties of the correction.

Storage, security and destruction of your personal information

Omni Bridgeway will take all reasonable steps to ensure that your personal information is kept secure and that it is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

Your personal information may be stored in hard copy documents and/or as electronic data in Omni Bridgeway's software or systems. Omni Bridgeway maintains physical security over its premises and also maintains computer and network security.

Omni Bridgeway requires its employees to respect the confidentiality of any personal information held by Omni Bridgeway.

Omni Bridgeway may be legally required to keep some of your personal information for a significant period of time. However, once Omni Bridgeway believes the information is no longer required, we will take reasonable steps to remove any identifying details or destroy the information entirely.

Omni Bridgeway's website and use of cookies

A cookie is a small data file that a website may write to your hard drive when you visit. A cookie file can contain information (such as a user ID) that the website can use to track the pages you have visited and your preferences. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data from your hard disk or read cookie files created by other websites. Omni Bridgeway uses cookies to track user traffic patterns through its website.

Dealing with Omni Bridgeway anonymously

Where lawful and practicable to do so, you can deal with Omni Bridgeway anonymously or using a pseudonym. You can deal with Omni Bridgeway anonymously or using a pseudonym when making a general enquiry about the services that Omni Bridgeway can offer to you including via telephone or our website.

At the time you engage our services, it is no longer practicable for you to deal with us anonymously or using a pseudonym.

Effect of the Policy

This Policy does not form a contract between an individual and Omni Bridgeway. This Policy may change to reflect Omni Bridgeway's business, laws and technology. Whenever you need to refer to this Policy you should refer to Omni Bridgeway's website - www.imf.com.au - or contact us for the most up to date version.

Please note that Omni Bridgeway's website contains links to other websites. When a user has clicked on a link to another site, they leave the Omni Bridgeway site and are no longer protected by this Policy. Omni Bridgeway entities operating outside of Australia are subject to different laws regarding privacy. If you access the websites of such other entities, either directly or via the Omni Bridgeway site, you should ensure that you check the privacy policy of each site.

How you may lodge a complaint about privacy and how Omni Bridgeway will deal with the complaint

If you believe that Omni Bridgeway has breached a term of this Policy or the Australian Privacy Principles you may submit a written complaint. The written complaint can be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 28 days from receiving the complaint. Contact details are as follows:

Telephone: +61 8 9225 2300

Address: Level 6, 37 St George's Terrace, PERTH WA 6000

Email: **privacyofficer@omnibridgeway.com**

If you are unsatisfied with the outcome of your complaint you may ask the Privacy Officer to be referred to a higher authority within the company, such as Omni Bridgeway's Managing Director. If you still remain unsatisfied with the outcome, you may refer your complaint to the Office of the Australian Information Commissioner to be resolved (www.oaic.gov.au or telephone 1300 363 992).

Contacting Omni Bridgeway

If you wish to gain access to your personal information, amend your personal information, request not to receive direct marketing communications from Omni Bridgeway, have any query regarding the Policy or wish to obtain a hard copy of the Policy, please contact our Client Liaison team:

Telephone: 1800 016 464 (freecall within Australia) or +61 8 9225 2322

Address: PO Box Z5106, St George's Terrace, PERTH WA 6831

Fax: +61 8 9225 2399

Email: **privacy@omnibridgeway.com**

This Policy was last updated October 2018.