

Omni Bridgeway (UK) Limited ("**Omni Bridgeway**", "**we**", "**our**" or "**us**") based at 81 Chancery Lane, London, WC2A 1DD, United Kingdom is responsible for and is the data controller of your personal information (except as noted below).

We are part of a wider group of companies (**Omni Bridgeway Group**) (the Omni Bridgeway Group also includes offices in Australia, Hong Kong, the United States, Canada, Singapore, The Netherlands, Switzerland, Germany and the United Arab Emirates), and in some cases, the Omni Bridgeway Group entity responsible for your personal information will be the member of the Omni Bridgeway Group that originally collects information from or about you (for example, Omni Bridgeway Limited, ACN 067 298 088, of Level 18, 68 Pitt Street, Sydney, NSW 2000, Australia).. This will be explained in separate privacy notices made available when your personal information is first collected by that Omni Bridgeway Group entity, for example where you or the business you work for engages us to provide a service. You can find out more about our Omni Bridgeway Group at www.omnibridgeway.com or by contacting us using the information in the contact section.

We acknowledge that privacy is an important individual right and we are committed to respecting your privacy and protecting your personal information.

This Privacy Policy (or "**Policy**") explains how we collect, use and share personal information in the course of our business activities, including:

- What personal information we collect and when and why we use it
- How we share personal information within our company and with our Group companies, service providers, regulators and other third parties
- Explaining more about Direct Marketing
- Transferring personal information globally
- How we protect and store your personal information
- Use of Cookies
- Legal rights available to help manage your privacy
- How you can contact us for more support

Updates

This Policy may change to reflect Omni Bridgeway's business, laws and technology. We will place

any updates on www.omnibridgeway.com. Whenever you need to refer to this Policy you should refer to our website or contact us for the most up to date version.

Third Party Websites

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. 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.

WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT

Omni Bridgeway generally collects personal information directly from you, your authorised representative or another third party. 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. Omni Bridgeway may also collect your contact information and personal details about your individual claim when you use Omni Bridgeway's services directly.

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 or from a third-party source.

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 and you consent to the collection. Where you have given your consent and if particularly sensitive data is processed by Omni Bridgeway, we will ensure there are appropriate policies in place which both safeguard such personal data and comply with all relevant legislation and policies.

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.

Personal information we collect and use if you use our website or use or request to use our services

If you use our website, or one of our services (including a request to use our services) personal data that may be collected from you includes:

- your full name and personal details;
- home address and history;
- email address(es);
- home and mobile telephone numbers;

- job title;
- organisation/employer name;
- financial details (share trading data and supporting documentation);
- sound / voice recordings (voicemail / phone messages and sometimes telephone conversations);
- records of products and services you've obtained and/or applied for from us, how you use them and the relevant technology used to access and manage them (e.g. your IP address, device identification number, mobile phone location data, MAC address);
- consumption habits;
- information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources, as noted further below; and/or
- where you contact us, Omni Bridgeway may keep a record of details of the contact.

In order to provide clients with our services, Omni Bridgeway also collects information relating to the legal proceedings or claims for which funding is sought or being provided. Some of this information may contain your personal data (for example, procedural information as the parties to a dispute and their solvency status, cases involving family trusts and beneficiary details and relevant relationships (subject in each case to compliance with all relevant confidentiality restrictions), and other facts collated in respect of a claim.

Personal information we collect from third party sources

Omni Bridgeway may collect personal information about you from our third-party partners, including aggregators who provide your personal information to us for share trading cases, financial planners, pension funds, accountants, stock brokers, and insurers.

We may also collect personal information about you from a publicly maintained record or from the public domain generally (for example via the internet or social media platform).

How we use your personal information

We request you to provide your personal data so that we can provide our services to you (and if not provided in the form requested we may not be able to provide our services as requested, or at all).

We collect, hold, process, disclose and use your personal information to:

- provide our services and products to you (for example, for our legitimate interest in managing your claim(s));
- 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;
- correspond with website users to resolve their queries or complaints;
- if you are a prospective employee, manage a recruitment, work placement or internship process, including considering applications and making offers and related activities;
- 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.

Legal basis for using your personal information

All processing (i.e. use) of your personal information is justified by a "condition" for processing. We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this. This justified 'condition' may be because:

- we need to use your personal information to perform a contract or take steps to enter into a contract with you and to provide you with our services;
- we need to use your personal information for our legitimate interest as a commercial organisation subject to your interests and fundamental rights (which will apply to the majority of our activities under this Policy, for example, we have a legitimate commercial interest in processing your data in order to manage your claim and case. We also have a legitimate interest in building good relations with our clients by maintaining client relationship management databases and contacting our clients from time to time). In all cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights; and/or
- we need to use your personal information to comply with a relevant legal or regulatory obligation that we have (for example, in relation to certain checks we are required to carry out on prospective clients and claims; disclosures we are required to make to tax or fraud authorities, or information we are required to keep about our clients, shareholders and business contacts).

If you would like to find out more about the legal basis for which we process personal information please contact us at legal@omnibridgeway.com.

SHARING PERSONAL INFORMATION OTHERS

Omni Bridgeway shares your personal information in the manner and for the purposes described below:

- Omni Bridgeway is in a group with affiliates, divisions and offices situated in a number of locations globally and it will therefore be necessary, from time to time, to pass your information between Omni Bridgeway locations internationally and with other companies within our group where such disclosure is necessary to provide you with our services or to manage our business.
- The Omni Bridgeway companies comprise:
 - Omni Bridgeway Limited
 - Omni Bridgeway Holdings (USA) Inc
 - Omni Bridgeway Capital (Canada) Limited
 - Omni Bridgeway (Singapore) Pte Limited,and any other group entity managed within the Omni Bridgeway Group from time to time.
- with third parties who help manage our business and deliver services or perform functions on our behalf. These third parties have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. For example, these include third party IT service providers who help manage our IT and back office systems and also includes solicitors, barristers and/or any other experts engaged to provide you with services which Omni Bridgeway has agreed to fund;
- with a defendant or respondent in proceedings in relation to which Omni Bridgeway has agreed to provide funding to you for the purpose of Omni Bridgeway performing its obligations to you under an agreement between you and Omni Bridgeway or to comply with applicable law;
- with government organisations and agencies, courts, law enforcement and regulators to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;
- with credit reference agencies and organisations working to prevent fraud in financial services;
- we may share in aggregate, statistical form, non-personal information regarding the visitors to our website, traffic patterns, and website usage with our agents, affiliates or advertisers and other service providers such as "Google" (for example use of "Google Analytics" services - which we confirm is always on a non-personal information basis);
- if, in the future, we sell or transfer some or all of our business, shares or assets to a third party, we may disclose information to a potential or actual third-party purchaser of our business, shares or assets and this may include your personal information as an asset of the business; and/or
- with lawyers, law firms and related legal service providers in the event that we decide not to proceed with, or to cease, providing funding to you for the purpose of you proceeding with a relevant claim. These parties agree to strict confidentiality restrictions and use any

personal information we share with them or which they collect on our behalf solely for the purpose of providing legal confidential services.

DIRECT MARKETING

How we use personal information to keep you up to date with our products and services

Omni Bridgeway may use personal information to let you know about our products and services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful. In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

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 to you. Omni Bridgeway does not sell or trade personal information.

How you can manage your marketing preferences

To protect privacy rights and to ensure you have control over how we manage marketing with you:

- where you have not opted-out of receiving direct marketing, we will take steps to limit any direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you;
- at any time you can update or correct your personal profile, or change your preferences for the way in which you would like us to communicate with you, including how you receive details of latest offers or news updates from us by contacting our client liaison team by [clicking here](#);
- you can 'opt-out' and ask us to stop direct marketing or other communications at any time - you can ask us to stop sending email marketing by sending an email to portal@omnibridgeway.com stating that you wish to unsubscribe from marketing communications from us. Alternatively, you can contact our client liaison team by [clicking here](#). Please do let us know whether you would like us to stop all forms of marketing or just a particular type (e.g. email); and
- you can change the way your browser manages cookies, which may be used to deliver online advertising, by following the settings on your browser as explained in the [Cookies](#) section of this Policy.

We recommend you routinely review the privacy notices and preference settings that are available to you on any social media platforms as well as your preferences within your account with us.

TRANSFERRING PERSONAL INFORMATION GLOBALLY

We operate on a global basis. Accordingly, your personal information may be transferred and stored in countries outside of the UK including the United States of America, Australia and Canada, that are subject to different standards of data protection.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable laws and carefully managed to protect your privacy rights and interests and transfers are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights. To this end:

- we will ensure transfers within our group of companies will be covered by a data transfer agreement entered into by members of Omni Bridgeway Group name (an intra-group agreement) using the EU Commission approved Standard Contractual Clauses which contractually obliges each member to ensure that personal information receives an adequate and consistent level of protection wherever it is transferred within our group of companies;
- where we transfer your personal information outside Omni Bridgeway Group or to third parties who help provide our products and services, we will obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of personal information transferred from within the EU to the United States, or the use of EU Standard Contractual Clauses approved by the EU Commission for the transfers of personal data to a third country adding adequate safeguards; or
- where we receive requests for information from law enforcement or regulators, we will carefully validate these requests before any personal information are disclosed.

You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

HOW WE PROTECT AND STORE YOUR INFORMATION

Security

Omni Bridgeway has implemented appropriate technical and organisational security measures, policies and procedures appropriate to the nature of the information concerned to ensure that your personal information is kept secure and that it is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

Measures we take include:

- placing confidentiality requirements on our staff members and service providers;
- following strict security procedures in the storage and disclosure of your personal information to prevent unauthorised access to it; and
- using secure communication transmission software (known as "**secure sockets layer**" or "**SSL**") that encrypts all information you input on our website before it is sent to us. SSL is an industry standard encryption protocol and this ensure that the information is reasonably protected against unauthorized interception.

As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect User IDs and passwords, please take

appropriate measures to protect this information.

Storing your personal information

Omni Bridgeway will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this privacy policy. 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.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

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. Cookies help us remember information about your visit to our website, like your country, language and other settings. Cookies allow us to understand who has seen which webpages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our website. They can also help us to operate our website more efficiently and make your next visit easier. Cookies can allow us to do various other things, as explained further in our Cookie Policy which you can access by clicking on the link below.

For more information about how our cookies work and information about how to manage your cookie settings please visit our [Cookie Policy](#).

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. Click on the links below to learn more about each right you may have:

- To access personal information
- To rectify / erase personal information
- To restrict the processing of your personal information
- To transfer your personal information
- To object to the processing of personal information
- To object to how we use your personal information for direct marketing purposes
- To obtain a copy of personal information safeguards used for transfers outside your

jurisdiction

- To lodge a complaint with your local supervisory authority

If you wish to access any of the above mentioned rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

You can exercise your rights by **contacting us**. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

While we take every effort to meet your request, please note that we may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

RIGHT TO ACCESS PERSONAL INFORMATION

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of; (a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see [right to object](#)); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which Omni Bridgeway is subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

The primary point of contact for all issues arising from this privacy policy is our Group Privacy Officer:

Telephone: +61 8 9225 2300
Address: Level 6, 37 St George's Terrace, PERTH WA 6000
Email: [**legal@omnibridgeway.com**](mailto:legal@omnibridgeway.com)

We will investigate and attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

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**](mailto:privacy@omnibridgeway.com)

To contact your data protection supervisory authority

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 our response, you have a right to lodge a complaint with your local data protection supervisory authority (i.e. your place of habitual residence, place or work or place of alleged infringement). In the UK, this will be the UK Information Commissioner's Office, contactable at [**ico.org.uk**](http://ico.org.uk).

This Policy was last updated October 2018.