

Omni Bridgeway (Singapore) Pte Limited ("**Omni Bridgeway**") has a commitment to respecting your privacy and believes that privacy is an important individual right.

This Privacy Policy ("**Policy**") applies in relation to Omni Bridgeway's operations in Singapore and explains how Omni Bridgeway complies with the Personal Data Protection Act (Cap 26 of 2012) (the "**PDPA**").

This Policy relates to the collection, storage, disclosure and use of personal information that is covered by the PDPA, being personal data relating to an individual. This Policy is not intended to cover information that is not covered by the PDPA.

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 at www.omnibridgeway.com.

Background

Omni Bridgeway is a company incorporated in Singapore, which provides 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 Singapore and other jurisdictions.

Omni Bridgeway is a subsidiary of Omni Bridgeway Limited, an Australian public company listed on the Australian Securities Exchange (ASX: OBL). The Omni Bridgeway group also includes offices in Australia, 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 data directly from you or your authorised representative. In some instances, Omni Bridgeway may collect your personal data before any official engagement is entered into between you and Omni Bridgeway. For example, Omni Bridgeway may collect personal data 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 data via our website) your personal data 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.

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.

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 data from a third party or source. For example, Omni Bridgeway may collect personal data about you from a publicly maintained record or from the public domain generally (for example via the internet or media). Omni Bridgeway will take reasonable steps where necessary to notify you when it collects your personal data from a third party or source.

Using and disclosing your personal information

Omni Bridgeway collects, holds, discloses and uses your personal data 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 data 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 data that Omni Bridgeway holds, Omni Bridgeway prohibits the third party from using personal data about you except for the specific purpose for which Omni Bridgeway supplies it.

Omni Bridgeway does not disclose any personal data 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 Singapore

Omni Bridgeway may disclose your personal data 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.

Without limiting the foregoing, it is contemplated that your personal data may be disclosed to offices and agents of the Omni Bridgeway Limited group of companies located in Australia.

Omni Bridgeway will take reasonable steps to ensure that any overseas persons or entities to whom any personal data is disclosed to are bound by legally enforceable obligations to provide a standard of protection that is comparable to that under the PDPA.

Accessing and correcting personal information Omni Bridgeway holds about you

You can contact Omni Bridgeway at any time to request access to your personal data or for your personal data to be corrected or updated. Please direct your request to Omni Bridgeway's Data Protection Officer on the details provided below.

Unless an exception applies, Omni Bridgeway will, on request, at no charge and within 28 days provide you with access to the personal data Omni Bridgeway holds about you. Omni Bridgeway will provide you with access to your personal data 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 PDPA, 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 data 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 data 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 data is kept secure and that it is protected from misuse, interference, loss, unauthorised access, modification or

disclosure.

Your personal data 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 data held by Omni Bridgeway.

Omni Bridgeway may be legally required to keep some of your personal data for a significant period of time. However, once Omni Bridgeway believes the information is no longer required for legal or business purposes, 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 data 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.

Spam Control Act

Omni Bridgeway complies with the Spam Control Act (Cap 311A) which regulates the sending of emails and other commercial electronic messages with a Singapore link. An electronic message has a Singapore link where:

- the message originates in Singapore;
- the sender of the message is:
 - an individual physically present in Singapore when the message is sent; or
 - an entity whose central management and control is in Singapore when the message is sent;
- the computer, mobile telephone server or device that is used to access the message is located in Singapore;
- the recipient of the message is:

- an individual who is physically present in Singapore when the message is accessed; or
- an entity that carries on business or activities in Singapore when the message is accessed; or
- if the message cannot be delivered because the relevant electronic address has ceased to exist (assuming that the electronic address existed), it is reasonably likely that the message would have been accessed using a computer, mobile telephone, server or device located in Singapore.

For the avoidance of doubt, the foregoing does not apply to any electronic message where the sending of the message is authorised by the Government or a statutory body on the occurrence of any public emergency, in the public interest or in the interests of public security or national defence.

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.sg - 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 Singapore 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 PDPA 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 Data Protection Officer will consider your complaint and respond as soon as reasonably possible, but not more than 28 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may ask the Data Protection 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 Personal Data Protection Commission (<https://www.pdpc.gov.sg/home> or telephone +65 6377 3131).

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, wish to lodge a complaint about privacy, have any query regarding the Policy or wish to obtain a hard copy of the Policy, please contact our Data Protection Officer as follows:

By telephone: +61 8 9225 2300
Address: PO Box Z5106, St George's Terrace
PERTH Western Australia 6831
By email: privacyofficer@omnibridgeway.com

This Policy was last updated on 21 June 2017
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