

Omni Bridgeway Capital (Canada) Limited (“**Omni Bridgeway**”) is the Canadian arm of Omni Bridgeway Limited, an Australian company listed on the Australian Securities Exchange (ASX: OBL), providing funding for high value legal claims and other related services in Canada. The Omni Bridgeway group also includes offices in Australia, Hong Kong, the United Kingdom, United States, Singapore, The Netherlands, Switzerland, Germany and the United Arab Emirates.

Omni Bridgeway is committed to the protection of your personal information and respect for your privacy choices.

This Privacy Policy (“**Policy**”) applies in relation to Omni Bridgeway’s commercial activities in Canada and explains how Omni Bridgeway complies with applicable federal and provincial privacy legislation.

This Policy relates to the collection, use and disclosure (“**handling**”) of personal information as defined in applicable legislation, being information about an identifiable individual. This Policy is not intended to cover information other than personal information.

When you submit personal information to Omni Bridgeway, or authorize us to obtain personal information from other sources, you are agreeing to be bound by this Policy. As described below, in most cases you may withdraw your consent to the handling of your personal information at any time.

The following ten principles govern our actions as they relate to the handling of personal information.

### 1. Principle 1 - Accountability

Omni Bridgeway is accountable for all personal information in our control, including personal information disclosed to third parties we retain to assist us in providing services. Omni Bridgeway has designated a global privacy officer to promote a culture of privacy compliance within Omni Bridgeway and the larger family of companies associated with Omni Bridgeway, including by implementing personal information handling procedures.

Please note that Omni Bridgeway’s website contains links to other websites. When you click on a link to another site, including a link to another entity associated with Omni Bridgeway operating outside of Canada, you leave the Omni Bridgeway site and this Policy will not apply to the handling of personal information on the other site. Omni Bridgeway is not responsible for, and does not endorse, the content, security or reliability of any third party site linked on omnibridgeway.com. If you access such websites, either directly or via the Omni Bridgeway site, you should review the privacy policy of each site.

### 2. Principle 2 - Identifying Purposes

Omni Bridgeway will inform you (either by making this Policy available, through other written communications or orally) of the purposes for which we collect personal information before or at the time the information is collected. Several common purposes

are identified below. In addition, we may inform you of other purposes from time to time.

Omni Bridgeway generally collects personal information directly from you or your authorized representatives. For example, Omni Bridgeway may collect personal information about you when you (or your representatives) 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 meet with a representative of Omni Bridgeway. If you contact us, Omni Bridgeway may keep a record of that contact.

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 organization/employer name. Omni Bridgeway does not collect sensitive personal information (such as information about your health or religion) unless it is reasonably necessary for the services Omni Bridgeway provides and you consent to the collection.

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 may also collect personal information from third party public sources, such as the internet, media, or court or government registries. For example, Omni Bridgeway may collect personal information about you from a publicly maintained record of property ownership and encumbrances.

Omni Bridgeway uses cookies to track user traffic patterns through its website. 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 to record your preferences for future visits. In addition, Omni Bridgeway may use third party cookies that track how you use omnibridgeway.com in order to target advertisements to you on other websites. You may block cookies by adjusting your internet browser settings, although this may interfere with the functionality of the Omni Bridgeway website. For more information on blocking cookies or targeted advertising, visit the Digital Advertising Alliance of Canada page <http://youradchoices.ca/choices/>.

### 3. Principle 3 - Consent

Omni Bridgeway will obtain your meaningful consent before or when we collect, use or disclose personal information. Depending on the circumstances, consent may be express, implied, or given through an authorized representative. You may withdraw your consent at any time, subject to certain legal or contractual restrictions and upon providing reasonable notice. However, in some cases, withdrawing your consent to the handling of some or all personal information may prevent Omni Bridgeway from providing services to you.

In exceptional circumstances, personal information may be handled by Omni Bridgeway without your knowledge or consent where such collection, use or disclosure is permitted or required by law.

### 4. Principle 4 - Limiting Collection

The personal information collected by Omni Bridgeway will be limited to those details

necessary for the purposes identified in this Policy and in other communications with you. Omni Bridgeway only collects personal information using fair and lawful means.

## 5. Principle 5 – Limiting Use, Disclosure and Retention

Omni Bridgeway will only use or disclose personal information for the purposes for which it was collected, as identified in this Policy and in other communications with you, or when it is required or permitted by law. Omni Bridgeway retains personal information only for the amount of time needed to fulfil those purposes, after which the personal information is destroyed or made anonymous.

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

- provide our services and products to you;
- market our services and products to you;
- 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;
- other purposes related to any of the above.

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;
- lawyers, experts and other third parties engaged to provide you with services that Omni Bridgeway has agreed to fund;
- potential business partners and their advisors in the context of a potential or actual sale of, or investment in, all or part of Omni Bridgeway's business;
- anyone else to whom you authorize us to disclose it.

If Omni Bridgeway discloses personal information to third parties engaged to perform services for us, Omni Bridgeway prohibits the third party from using personal information for any purpose other than the specific purpose for which Omni Bridgeway supplies it. Omni Bridgeway requires third parties who receive personal information to use safeguards equivalent to those in place at Omni Bridgeway to protect that information.

Omni Bridgeway does not disclose personal information 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, although personal information may be transferred as part of a business transaction.

Omni Bridgeway may disclose personal information to third party service providers or affiliates (including its parent company, Omni Bridgeway Limited) outside of Canada, and may use or store personal information outside of Canada, in which case your personal information will be subject to the laws of that jurisdiction, including laws related to the disclosure of personal information to law enforcement authorities.

In certain circumstances, Omni Bridgeway may have a legal duty or right to disclose personal information without your knowledge or consent. For example, Omni Bridgeway may need to disclose personal information in order to comply with tax or corporate governance legislation, to assist law enforcement or to collect a debt.

#### 6. Principle 6 – Accuracy

Omni Bridgeway will keep personal information as accurate, complete and updated as necessary to fulfil the purposes for which it is used.

You can contact Omni Bridgeway to request access to your personal information to review its accuracy or to update your personal information. Please make a request in writing, using any of the contact methods described below.

#### 7. Principle 7 – Safeguarding Personal Information

Personal information under Omni Bridgeway's control is protected by physical, organizational and technological safeguards appropriate to the sensitivity of the information.

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

#### 8. Principle 8 – Openness

Omni Bridgeway is open about our personal information handling practices. Upon request, Omni Bridgeway will disclose the contact information for its Privacy Officer, the means by which you may gain access to your personal information on file, a description of the type of personal information held and how it is generally used and disclosed, and a copy of this Policy. In addition, most of this information is described in this Policy.

#### 9. Principle 9 – Individual Access

Upon written request, Omni Bridgeway will tell you about the existence, use and disclosure of your personal information, and will provide access to that information. Omni Bridgeway will take appropriate steps to verify your identity (or verify that you act as a legal guardian or authorized agent of the individual concerned) before responding to a request to access

personal information. If you believe any of your information is inaccurate or incomplete, you may make a request that Omni Bridgeway amend the information.

Omni Bridgeway will respond to access requests within a reasonable time and at minimal or no cost to you. Omni Bridgeway will provide you with access to your personal information in a manner requested by you, provided it is reasonable and proportionate to do so.

If Omni Bridgeway is unable to provide you with access to the information, Omni Bridgeway will provide you with reasons, except where prohibited by law. Omni Bridgeway will also provide you with details of the process for making a complaint about the refusal to grant you access.

## 10. Principle 10 – Addressing Concerns

Omni Bridgeway has procedures in place to receive, investigate and respond to questions and concerns about our handling of personal information. You may contact Omni Bridgeway's Privacy Officer to request information about our personal information practices or to submit a written complaint.

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 applicable federal or provincial privacy regulator. Omni Bridgeway will provide you with the contact information for the applicable regulator upon request.

### Contacting Omni Bridgeway

If you wish to gain access to your personal information, amend your personal information, withdraw consent to some or all handling of your personal information (including opting out of marketing communications from Omni Bridgeway), or have any questions or concerns about our personal information practices, please contact our global Privacy Officer:

Email: [privacy@omnibridgeway.com](mailto:privacy@omnibridgeway.com)  
Address: PO Box Z5106, St George's Terrace, Perth, WA, Australia 6831  
Fax: +61 8 9225 2399

### Currency and Revisions

This Policy may be amended from time to time. An amended Policy will be posted to our website, [www.omnibridgeway.com](http://www.omnibridgeway.com), when it comes into effect. Whenever you need to refer to this Policy you should refer to Omni Bridgeway's website to ensure you have the most up to date version.

**This Policy is effective as of 12 January 2017.**