

Privacy Policy

1. OVERVIEW

RFC Ambrian Group Limited (ABN 98 096 493 588) and its subsidiaries ("RFC Ambrian") appreciates the importance of its role in handling and storing your personal information. This policy explains how RFC Ambrian manages your personal information which we may collect, use, store and disclose in order to deliver our services to you. It also provides contact details should you wish to contact us to access or request a correction to your personal information which we hold.

RFC Ambrian's privacy policy has been drafted to comply with the requirements of with the relevant privacy legislation in the jurisdictions in which we operate being the Australian *Privacy Act 1988 (Cth)*, *Australian Privacy Principles* and the United Kingdom's *Data Protection Act 1998*. This policy applies to RFC Ambrian Group Limited and its subsidiaries which are listed under the Contacts section, below.

The policy may be updated from time to time in response to operational and legislative changes so please refer back to this location from time to time for updates.

2. COLLECTION, USE AND DISCLOSURE

- We only collect personal information to the extent required to enable us to deliver our services, to evaluate an application for employment and/or to comply with applicable laws and regulation.
- We will only use your personal information for the primary purpose for which it was collected (or for a secondary purpose only if it relates to the primary purpose and a use which we would reasonably believe you would expect in the circumstances).
- The information we might collect from you may include contact and identifying information, financial information, banking details, membership to organisations and professional bodies, employment history and education details.
- You are not required to provide this information to us however declining to do so will likely mean we are unable to deliver services to you.
- Wherever possible we collect information directly from you via one or more of the following modes: completion of transaction documentation, completion of forms; interview or meeting, shared business card or any other direct communication to us (email, online, letter, fax, phone).
- In certain transactions we may be required to acquire 'sensitive information' (eg. health information or criminal background checks). In accordance with the more rigorous regulation relating to sensitive information, however, this information is only collected with your specific knowledge and agreement.
- In certain circumstances we may be required to verify the information you supply to us. We will generally work with you to satisfy these requirements unless we are prohibited from doing so by law.
- We may disclose your personal information to third parties to enable us to provide the services you have requested. This will not be done without your consent unless we believe you would reasonably expect us to disclose the information in the circumstances (for example, to third party service providers involved in a specific transaction). We may also be required by law or court order to disclose your personal information to

regulatory or government bodies. In those circumstances we adopt reasonable precautions to ensure that your personal information is held securely in accordance with relevant privacy legislation and this policy.

- Submission of your CV for the purposes of an employment enquiry means that you consent to our contacting any referees you have listed. Any material supplied or generated as a result of your application will be accessible only by staff or recruitment consultants involved in the selection process and will not be retained longer than 6 months in the event that your application is unsuccessful.
- RFC Ambrian does not purchase or sell personal or contact data.

3. **COOKIE POLICY AND INFORMATION COLLECTED VIA OUR WEBSITE**

RFC Ambrian employs limited use of 'cookies' in the operation of its website. These small text files enables our website to interact with your web browser (on your computer or mobile device) helping us to analyse how our website is used, which countries our website traffic comes from and to assist with providing an efficient user experience to you. The cookies cannot collect any information stored on your computer or device. Although cookies can identify your IP address, RFC Ambrian has no means of identifying you from this information unless you supply personal details by submitting the information on our contact form. Where you are accessing our online dataroom facilities on this website using log-in information provided you are responsible for the security of the log-in information and take responsibility to ensure the confidentiality of this information.

4. **ANTI MONEY LAUNDERING LEGISLATION**

RFC Ambrian operates in jurisdictions requiring it to comply with laws designed to combat money laundering and terrorism financing. For some transactions we may be required by law to collect and verify particular personal information before we can deliver certain services to you. We are mindful of the apparent intrusiveness of these identification procedures and the staff you deal with would be pleased to discuss any concerns you may have. We may be required to store your personal identifying information for statutorily defined durations.

5. **CROSS BORDER DISCLOSURE**

RFC Ambrian is a group of companies with offices in Sydney, Perth and London. Your personal details may be held and accessible by staff in these locations however only in accordance with this policy.

Disclosure of personal information to third parties within Australia and the UK (or in countries associated with a specific corporate advisory transaction) will be limited to information that we reasonably believe will be protected in accordance with this policy and that also the information

- is relevant to a specific transaction and for which we have your agreement to the disclosure;
- is shared for purposes of your employment or for assessing your suitability for employment; or
- that we reasonably believe that you would expect us to disclose in the circumstances.

6. **SECURITY OF YOUR PERSONAL INFORMATION**

At all times RFC Ambrian will take such steps as are reasonable in the circumstances to protect your data from unauthorised access, unnecessary duplication, modification and disclosure or for uses not consistent with this policy. These measures include having appropriate policies in place, staff training, utilization of passwords and network wide security measures.

It should be noted however that it is impossible to fully guarantee security for communications conducted over the internet and the World Wide Web. Therefore, you should note that you also have a role to play in maintaining the confidentiality of your personal information such as password protection, encryption and physical security of your private data.

The majority of our information, including your personal information may be held on our computer network which is maintained by a third-party specialist IT company which monitors the integrity of our systems and equipment. We also may maintain paper records which are held securely in our offices. When your data is no longer required operationally or by law it will be securely disposed of, deleted, de-identified or put 'beyond use'.

If we become aware of a data breach we undertake to contact you to ensure you have the opportunity to respond to and/or minimise the impact of the data breach.

7. YOUR RIGHTS

You have the right to review your personal data held by us and ask for corrections to be made. Please make your request to us in writing via the contact addresses below or through our contact form on our website. There are certain circumstances where we may be entitled to refuse your request however, in general, we will inform you of those reasons unless prohibited from doing so by law.

A nominal fee may be levied for this data retrieval.

8. CONTACT INFORMATION

Please send requests, enquiries or complaints to the Privacy Officer at one of the offices below or via email at info@rfcambrian.com

RFC Ambrian Group Limited (ABN 98 096 493 588)

RFC Ambrian Limited (ABN 59 009 153 888)	RFC Ambrian Limited (UK company number 0423075)
Level 12 1 Macquarie Place Sydney NSW 2000 Australia	Condor House 10 St Paul's Churchyard London EX4M 8AL United Kingdom