

Privacy Policy

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 is 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)* and the United Kingdom's *Data Protection Act 1998*. This policy applies to RFC Ambrian Group Limited and its subsidiaries ("RFC Ambrian") 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.

1. COLLECTION, USE AND DISCLOSURE

We collect personal information to enable us to deliver our services and to comply with the 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 if it relates to the primary purpose and a use which we would reasonably believe you would expect in the circumstances].

When collecting your personal information RFC Ambrian will take reasonable steps to ensure that you are informed of the purpose of such collection and are informed of the existence of this policy. However notification can be withheld if it would be inconsistent with our legal obligations under Australian or United Kingdom laws or regulations [or the laws or regulations that may apply to a corporate transaction in any other jurisdiction].

We limit the data we collect to the minimum required to satisfy our contractual obligations to you, to satisfy legislation or regulation, to enable us to assess your application for employment or to respond to your questions or requests.

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). 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 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. [Would we undertake to notify a person of a third party request unless prohibited from doing so by law?]

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 only be accessible by staff or recruitment consultants involved in the selection process and] will not be retained longer than 12 months in the event that your application is unsuccessful.

RFC Ambrian does not purchase or sell personal or contact data.

2. ANTI MONEY LAUNDERING

RFC Ambrian is subject to a number of laws jurisdictions in which it operates which are 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.

3. INFORMATION WE COLLECT

The information we might collect from you may include identifying documentation, employment or education history, financial information and banking details, membership to organisations and professional bodies and also contact information. 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.

4. 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. [Is there or do we need more information available for this?]

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 relevant to a specific transaction and for which we have your specific agreement;
- [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 use its reasonable endeavours 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.

The majority of information is held on our network which is maintained by a third party network specialist company which monitors the integrity of our network. We also may maintain paper records which are held securely in our offices. {How do we address the fact that we may put data in the cloud? Guess we should not do it} When your data is no longer required operationally or by law it will be securely disposed of, deleted, de-identified or put 'beyond use'.

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 [understand that there is inevitably some risk attached to sharing of information]. 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.

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. ACCESS TO YOUR INFORMATION

You have the right to review your personal data held by us and ask for corrections to be made. Please make your request to [Australia] [United Kingdom] in writing via the contact addresses below or through our contact form on our website.

A nominal fee may be levied for this data retrieval.

8. CONTACT INFORMATION

The Privacy Officer [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 Gateway, 1 Macquarie Place Sydney NSW 2000 Australia	Condor House 10 St Paul's Churchyard London EX4M 8AL United Kingdom

9. LATEST UPDATE OF THIS POLICY

November 2017