

PRIVACY POLICY

About this policy

Clover Risk Funding Pty Ltd and its related companies¹ (CRF or **we, us, our**) are committed to respecting your privacy and managing your personal information fairly, transparently, and according to the *Privacy Act 1988* (Cth), the *Privacy Act 2020* (NZ) and the *Data Protection Act 1998* (UK) (together, the **Privacy Act(s)**), where applicable.

To the extent the *Data Protection Act 1988* (UK) applies, CRF is the data controller in relation to personal information and in most circumstances, it is also the data processor.

This policy (our **Privacy Policy**) outlines how we process, collect, hold, use, disclose, and otherwise manage Personal Information. This Privacy Policy also outlines how you can contact us in relation to it, including if you wish to make a complaint.

Personal Information

This Privacy Policy relates to the processing, collection, storage, use, and disclosure of “Personal Information” and “Personal Data” as those terms are defined in the Privacy Acts (we use the term “Personal Information” in this Privacy Policy). It is not intended to deal with how we manage information that is not covered by any of the Privacy Acts.

Personal Information is information about an identified individual, identifiable individual, or an individual who is reasonably identifiable. Individual in this context means a natural person. Common examples of Personal Information are an individual’s name, signature, address, telephone number, account details, or employment details.

In Australia, Personal Information includes commentary or opinion about a person.

Sensitive Information

This Privacy Policy also relates to the processing, collection, storage, use, and disclosure of “Sensitive Information”,² which means Personal Information that is:

- (a) about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, or criminal record; or

¹ Being Clover Risk Holdings Pty Ltd, Clover Risk Administration Pty Ltd, and Clover Risk Management Pty Ltd.

² “Sensitive Information” is a term used in the Australian Privacy Act. It is captured within the definition of “Personal Information” in both Australia and New Zealand and is referred to as “Special Categories” of information in the *Data Protection Act 1998* (UK)



- (b) health information, genetic information, biometric information, or biometric templates, about an individual.

What kinds of Personal Information do we collect and hold?

CRF collects and holds Personal Information that is reasonably necessary for us to conduct our business, provide our services, and meet our legal obligations (which are legitimate interests of our corporate group).

The precise nature of the Personal Information we collect and hold will depend on the circumstances in which we receive it. Ordinarily, it may include your name, addresses, email address, telephone number, payment information, job title, or employer name.

If you apply for a job with us, we will collect and hold Personal Information like qualifications and employment history and, if you obtain employment with us, then we will collect and hold your bank account, superannuation, and tax file number details.

CRF also collects anonymous online traffic data such as:

- (a) the location from which people access our [website](#), [online portal](#), [podcast](#), [LinkedIn profile](#), and digital business cards;
- (b) the number of sessions, length of sessions, new visitors, and the number of page views, button clicks and form submissions; and
- (c) the source of visitors, for example, search engine or email links.

CRF may also use tracking technology known as “cookies” to monitor, personalise and customise webpages accessed by browsers or users. You can accept or decline cookies by changing your browser settings (but doing so may change the way in which you are able to use our website).

CRF will not process, collect, hold, use, nor disclose any Sensitive Information unless:

- (a) it is reasonably necessary for one or more of our functions or activities, and you have consented (for example, you may tell us that you are a member of a professional association);
- (b) use of the information is required or authorised by law; or
- (c) it is reasonably necessary for a confidential alternative dispute resolution process, or to establish, exercise, or defend a legal or equitable claim (for example, you may disclose to us health information during litigation).

We do not collect and hold Personal Information about every individual we deal with.



How do we collect and hold Personal Information?

Direct collection

CRF generally collects Personal Information directly from you. Ordinarily, that may happen when you:

- (a) request our services or apply for funding, including via our [online portal](#);
- (b) communicate to us (by any means) details and information about a claim, a funded matter, or an application for funding or contact us for any other purpose (we may keep a record of that contact);
- (c) access and use the CRF [website](#), view or interact with our [LinkedIn profile](#) or the LinkedIn profiles of our directors and staff members;
- (d) meet or speak with our directors or staff in person, online, or by telephone, or attend an event or give us your business card;
- (e) send us a letter, facsimile, or email;
- (f) send us your contact information via cards.tapt.io (our digital business cards);
- (g) subscribe to any of our mailing lists or participate in a survey or questionnaire.

We will take such steps as are reasonable in the circumstances (if there are any available) to let you know that we are collecting Personal Information from you.

Third party collection

CRF may also collect Personal Information from third parties. Some examples of third-party sources are:

- (a) our business associates, counterparties, witnesses, insurers, and advisers; or
- (b) publicly available records such as websites, media, or database searches.

If we collect Personal Information about you from a third-party, we will take reasonable steps (if there are any available) to let you know that we have done so.

If we collect Personal Information about a third-party from you, you warrant to us and must ensure that:

- (a) you are entitled to disclose it to us and the individual concerned is aware of this Privacy Policy; and
- (b) the Personal Information is correct and has been collected and disclosed in accordance with the relevant Privacy Act (and any other applicable laws); and
- (c) without taking further steps, we may process, collect, hold, use, and disclose that information in accordance with this Privacy Policy.



Unsolicited collection

If we receive unsolicited Personal Information about you that we are not lawfully entitled to, we will destroy or de-identify the information as soon as practicable (provided it is lawful and reasonable for us to do so).

Storage

CRF takes reasonable steps to ensure that your Personal Information is held securely and is protected from misuse, interference, loss, unauthorised access, modification or disclosure. That includes:

- (a) maintaining physical security over our premises, hard copy records, and electronic devices; and
- (b) storing electronic information in a controlled and secure environment (which may include being stored by CRF on data servers operated by trusted providers located in Australia or overseas).

Why do we collect, hold, use, or disclose Personal Information?

CRF collects, holds, uses, and discloses Personal Information to conduct our business, provide our services, and meet our legal obligations (which are legitimate interests of the CRF group). That means we may collect, hold, use or disclose your Personal Information to:

- (a) contact and communicate with you or verify your identity;
- (b) provide our services and products (which are litigation funding services where we fund the investigation, establishment, exercise, or defence of a legal or equitable claim by either informal, litigious or alternative dispute resolution processes);
- (c) assess and process requests and enquiries regarding our services, including via online application forms from our [website](#) or [online portal](#), and deciding whether to provide funding;
- (d) comply with our legal, insurance, professional conduct, legislative, and regulatory obligations (including checking for conflicts of interest);
- (e) send you an invoice or account statement;
- (f) undertake searches relevant to our services;
- (g) purchase and pay for services or products from external service providers such as professional advisers;
- (h) manage or improve our services, business, internal operations, and relationships,
- (i) seek and obtain third party financial services and support;



- (j) manage personnel, employment, and recruitment;
- (k) perform administrative tasks related to any of the above; or
- (l) communicate with others for one or more of the above purposes.

The kinds of people and organisations that we may disclose your Personal Information to so that we can conduct our business, provide our services, and meet our legal obligations (being our legitimate interests of our corporate group, as described above) include our employees, directors, service providers, contractual counterparties, professional advisers, brokers, insurers, financiers, recruiters and human resource advisers, and lawyers, barristers or experts involved in the conduct of a funded claim.

If we disclose Personal Information to you about another individual, you must collect, hold, use and disclose that information in accordance with the relevant Privacy Act and only for the purpose for which it was supplied.

We may also use or disclose your Personal Information for a secondary purpose that is related to a purpose for which we collected it. However, we would only do so:

- (a) in Australia or New Zealand – where you would reasonably expect us to use or disclose your personal information for that secondary purpose, where you have consented to us using your Personal Information in that way, or where we are required or authorised to do so by law; or
- (b) in the UK – where the secondary purpose is compatible with the primary purpose for which the information was collected, where we are legally obliged to, or where you consent to us doing so.

Overseas disclosure

Save for the storage of Personal Information on data servers operated by providers located overseas, and the sharing of information between the entities comprising CRF, it is unlikely that CRF will disclose your Personal Information to overseas entities or persons.

We would only ever do so if it was required for us to perform our services to you. The countries in which we may disclose your Personal Information (if it was required) would depend on the circumstances of those services.

If overseas disclosure is necessary, we will seek to limit it to jurisdictions with substantially similar, adequate, and enforceable privacy protections, or we will take reasonable steps to ensure that any overseas persons or entities to whom Personal Information is disclosed are aware of and comply with whichever of the Privacy Acts is applicable in the circumstances. We may also require those recipients to enter into a contract with us that provides you with additional safeguards to protect your Personal Information.



You may also provide us with your informed consent to the overseas disclosure of your Personal Information, or we may reasonably believe that we are required by law to disclose your Personal Information to an overseas entity.

Nevertheless, you should be aware of, and you consent to, the inherent risks of overseas transfers of Personal Information. By using our [website](#) and providing CRF with your Personal Information, you are consenting to overseas disclosures of Personal Information.

Automated decision making

CRF does not use any automated decision-making processes to make choices about individuals or make choices that significantly affect individuals.

Using a pseudonym or interacting with us anonymously

Sometimes an individual may wish to deal with an organisation anonymously or by using a pseudonym. We may be able to facilitate a request to use a pseudonym or remain anonymous in relation to general enquiries only.

It is impracticable for CRF to provide its services unless it is dealing with an identified person. That is because our business operates within contractual arrangements, we cannot assess the veracity of claims without identifying the individuals involved, and in most cases, we are required by law to deal with an identified person and conduct conflict of interest checks. Therefore, if you choose to deal with us anonymously or pseudonymously, we may not be able to provide our services or assist you.

It may be impracticable for us to deal with you anonymously or pseudonymously for other reasons, in which case we may explain why and ask you to identify yourself.

Consent in relation to your Personal Information

Marketing

We may also use, and you consent to us using, your Personal Information to contact you for marketing purposes, including in relation to products, services, promotions, industry and case law updates, or events, by any mode of communication.

If you do not wish to receive those communications, you may object or opt out by either contacting our Privacy Officer (at the contact information provided in this Privacy Policy) or by following the prompts in the relevant communication (if applicable).

General

By using our [website](#), using any of our services, or otherwise providing your Personal Information to us, you consent to the terms of this Privacy Policy and any amendments made from time to time.



You have the right to opt out of our processing, collection, storage, use, and disclosure of your Personal Information as provided for in this Privacy Policy, or (in some cases) request the erasure of your Personal Information. Please contact us if you would like to make such a request so we can discuss that with you further.

Access to your Personal Information

You can contact CRF any time during ordinary Australian business hours to request access to the Personal Information about you that we hold, request details of how we have used your Personal Information or request the transfer of your Personal Information.

Unless an exception applies, we will:

- (a) take appropriate steps to verify your identity (or verify that you act as a legal guardian or authorised agent of the individual to which the Personal Information relates);
- (b) provide you with the Personal Information about you that we hold (if any) within 30 days of your request to us, or such other timeframe as is reasonable in the circumstances; and
- (c) provide you with the Personal Information about you that we hold (if any) in the manner requested by you, provided it is reasonable and practicable to do so.

Ordinarily, we will not charge you to provide your Personal Information. If we do charge, our fees will not be excessive, nor will they apply to the making of the request.

If we determine that CRF cannot provide you with access to your Personal Information, we will tell you why that is the case and any applicable exceptions or exemptions arising under the applicable Privacy Act. We will also tell you how to make a complaint about any refusal to grant you access to your Personal Information.

Correcting your Personal Information

CRF will take reasonable steps to ensure that the Personal Information about you that we collect and hold is accurate, up to date, complete, relevant, and not misleading.

You can contact CRF any time during ordinary Australian business hours to request that the Personal Information about you that we hold be corrected or updated. Upon request, we will:

- (a) take appropriate steps to verify your identity (or verify that you act as a legal guardian or authorised agent of the individual to which the Personal Information relates);
- (b) correct the Personal Information held within 30 days of your request to us, or such other timeframe as is reasonable in the circumstances; and
- (c) take reasonable steps to notify any relevant third parties of the correction.



If we refuse to correct your Personal Information, we will tell you why we refused (unless it would be unreasonable for us to do so) and tell you how to make a complaint about our refusal.

Upon your request that we issue a statement that Personal Information is inaccurate, incomplete, out of date, irrelevant, or misleading, we will take steps that are reasonable in the circumstances to make that apparent to users of the information.

Destruction of personal information

CRF is obliged to retain records of its operations for, generally, seven years. CRF also is also obliged to destroy or de-identify your Personal Information we hold once it is no longer required.

CRF will destroy or de-identify your Personal Information as soon as it is lawful, appropriate and reasonable for us to do so.

Exemptions that apply to Personal Information

In Australia, this Privacy Policy does not apply to any act done, or practice engaged in, by CRF or its related bodies corporate in their capacities as employer of any employees if the act or practice is directly related to its current or former employment relationship with an individual and employment records (as that term is defined in the Australian Privacy Act) related to the individual. However, CRF will only use and disclose a tax file number where it is lawful to do so.

Privacy Policy objections, complaints, and enquiries

If you have a complaint about our Privacy Policy, if you think we have breached our obligations, or if you wish to object to the processing of your Personal Information, please contact us directly. We also encourage you to provide us with your comments or feedback on this Privacy Policy. Our contact information is provided at the end of this Privacy Policy.

We will endeavour to respond to your complaint, comments, or feedback within 30 days, or such other timeframe as is reasonable in the circumstances.

If you are not satisfied with our response, you may make a formal privacy complaint by contacting:

- the [Office of the Australian Information Commissioner](#) in Australia;
- the [Office of the Privacy Commissioner](#) in New Zealand; or
- the [Information Commissioner's Office](#) in the United Kingdom.

Updates to and accessing our Privacy Policy

Our Privacy Policy is available free of charge on our [website](#) and is downloadable in portable document format. You may also request a copy of our Privacy Policy in a



different format, and we will take reasonable steps to comply with your request. We will not charge you to access and receive a copy of our Privacy Policy.

This Privacy Policy does not form a contract between any individual and us. Rather, it is a policy that may change from time to time to reflect our business, technology, and practices. Whenever you need to refer to this Privacy Policy, you should download it from our [website](#) or contact us for the most up to date version.

Our website may contain links to other websites. When a user has clicked on a link to another website, they leave the CRF [website](#) and are no longer protected by this Privacy Policy. You should consider the privacy policies of other organisations before using their websites, because we are not responsible for the privacy practices of any third-party operators of websites.

This Privacy Policy was last reviewed by the directors of CRF and updated on 31 August 2026.

Contact us

If you want to contact us in relation to any of the matters dealt with in this Privacy Policy, please use the information provided below:

Clover Risk Funding Pty Ltd
Attention: Privacy Officer
Level 10, 55 Clarence Street
SYDNEY NSW 2000
Email: admin@cloverriskfunding.com