



Privacy Policy

This policy explains how and why we collect, use, hold and disclose your personal information.

In this policy, “**we**”, “**us**” and “**our**” refers to Odyssey Marine Pty Ltd (ACN 121 538 430) and any related body corporates and any other business we may nominate as covered by this policy from time to time.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

1. Our commitment to your privacy

Our commitment in respect of your personal information is to abide by the Australian Privacy Principles (**APPs**) for the protection of personal information, as set out in the *Privacy Act 1988* (Cth) (**Privacy Act**).

2. Personal information

When we refer to personal information in this policy we mean any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

3. What personal information do we collect and hold?

We collect information about you and your interactions with us, for example, when you use any of our services, call us or visit our website at <http://www.odysseymarine.com.au/> (**Website**) or access our extranet (**Extranet**).

The information we collect from you may include your name, email address, postal address, telephone number, facsimile number, occupation and details of enquiries or complaints you make.

When you use our Website or Extranet we may collect information about your location or activity including your IP address. Your IP address is logged when you visit our Website or Extranet to analyse the ways people use our Website or Extranet but cannot be used to identify a user personally. Some of this Website and Extranet information we collect using cookies and similar technologies. A cookie is a small text file that the website may place on your device to store information.

We also use Google Analytics on our Website to obtain visitor data. Google Analytics tracks data by a unique tracking code installed on every page of the Website. This code is a small snippet of Javascript, or a coding language that runs in your browser when you visit those pages. Each time you visit the Website, the code tracks information about your visit and sets a cookie on your computer, which provides anonymous information to create user identification. You can disable these cookies on most internet browser settings.

4. How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When we collect personal information directly from you, we may collect in ways including:

- through your access and use of our Website;
- through your access and use of our Extranet that we may make available to you;
- during conversations between you and our representatives;
- by entering into a contract with us;
- by requesting information or material from us;
- by completing surveys, providing feedback or complaining to us; and/or
- by seeking employment with us.



We may also collect personal information from third parties including from, for example:

- third party companies such as credit reporting agencies, law enforcement agencies and government entities;
- your lawyers, accountants and financial advisers;
- publicly available sources of information; and/or
- any other organisations where you have given your consent.

5. Why we collect your personal information

We collect, hold and use your personal information so that we can:

- provide you with services;
- manage our relationship with you;
- contact you including to respond to your queries or complaints, or if we need to provide you with important information;
- comply with our legal obligations and assist government and law enforcement agencies or regulators;
- tell you about services that we think may be of interest to you;
- undertake administrative, marketing (including direct marketing), survey, and research purposes;
- update our records and keep your records up to date;
- for the purpose of determining whether to offer you employment with us; and/or
- for the purpose of assessing your fitness for work for us.

If you do not provide us with your personal information we may not be able to provide you with our services, communicate with you or respond to your enquiries.

6. Who do we disclose your personal information to and why?

We may disclose your personal information to our employees, related bodies corporate, contractors and service providers for the purpose of providing services to you.

We may also disclose your personal information to others outside our corporate group, so they may perform services on our behalf, such as:

- our suppliers and other third parties with whom we have commercial relationships for business, marketing and related purposes (such as auditors, lawyers, printers, postal services, call centres, hosting companies); and
- companies that provide information and infrastructure systems to us.

We may also disclose your personal information where:

- we are required or authorised by law to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

7. Do we disclose your personal information to anyone outside Australia?

We may disclose your personal information to a recipient which is located outside Australia.

8. Direct marketing

We will use your personal information to offer services we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by us, our related companies, our other business partners or our service providers.



Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

9. Access and correction to the personal information we hold about you

You have a right to request access or request correction of the personal information we hold about you by contacting our Privacy Officer. When requesting access to or correction of your personal information, please provide us with as much detail as you can about the particular information you wish to access or correct, in order to help us retrieve it. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date and complete.

10. Storage and security of your personal information

We take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. For example:

- Regular auditing and monitoring our internal staff access to personal information
- Destruction policy where we destroy personal information when it is no longer needed
- IT System security measures.

We endeavour to improve our security safeguards. However, no electronic data transmission is guaranteed to be secure, so we cannot guarantee that the information you provide to us electronically will be secure.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

11. Third Party Sites

Our Website and Extranet may contain, and we may provide links, to third parties' websites and services. Additionally, our services may be integrated with third party applications and services. These third-party websites and services are not subject to our privacy policy. Please visit the websites of or contact these third parties to view a copy of their privacy policy.

12. Contact Us

If you have any questions about this policy, you may contact us at:

Address: C/: Odyssey Marine, Suite 7 Level 2, 34 Charles Street, South Perth WA 6151

Telephone: (08) 6277 0240

Email: wesley.vanderspuy@odysseymarine.com.au

13. Changes to our Privacy Policy

We may change this policy from time to time or as the need arises.

This policy was last updated on 24 October 2018.