

ORBIS AUSTRALIA PRIVACY POLICY

A reference to 'we' and/or 'us' is a reference to Orbis Investment Advisory Pty Limited, a company incorporated in Australia with AFSL No. 237862. A reference to 'you' or 'your' is a reference to any person who views this privacy policy, those persons who have disclosed that they are from Australia when visiting the www.orbis.com website or those persons who are resident in Australia and have provided information to us.

Our privacy policy

We understand that privacy is important. So our privacy policy explains how we will keep your personal information private according to the Privacy Act 1988 (Cth) and the Australian Privacy Principles, as applicable.

Your access to (or use of) this website and the provision of information to us (by whatever means) indicates your acceptance of our privacy policy and you consent for us to collect and use your personal information according to this policy and the Orbis Group's privacy policy. These privacy policies may change from time to time, without notice.

What personal information do we collect?

Personal information means any information that can identify you. We obtain personal information in order to provide you with our services or manage our relationship with you. This includes details such as your name, address, contact information, birth date, and nationality.

We may sometimes need to collect personal information from individuals who are not our customers/clients, for example, business contact details of a company representative or authorised signatories whom we normally deal with.

Generally, we will not collect sensitive information about you (e.g. your ethnic background, political or religion belief or health information) unless such information is required for providing our services to you and with your explicit consent, or where required by law.

How is personal information collected and stored?

In most cases, we will collect personal information about you from the forms you complete in relation to your investment in an Orbis fund or instructions you provide verbally or in writing to our Client Services team.

When you visit our website, we collect information about your visit using 'cookies'. Cookies are pieces of information that a site sends to your computer's hard disk when you access information on that site. Cookies do not identify individual users, however, our servers may record information about your usage, the time of your visit, its duration, the pages you visit and style settings. We may use this information and other related site information to measure your interest in the contents provided and as such to continuously respond to your needs and improve our service.

Orbis may provide links to other websites, once you link to another site, you will be subject to that site's privacy policy.

We will take all reasonable steps to protect your personal information from loss, unauthorised access, destruction, use, modification or disclosure.

How is personal information used?

We only use your personal information for the purposes for which it was collected, such as to assist you from a client management perspective or to facilitate the processing of your application, transaction or other requests. If you do not provide us with such information, we may be unable to provide you with the assistance or service you require. Once we no longer require your personal information, we will take reasonable steps to either destroy or permanently de-identify this information.

We will not disclose your personal information except to:

- companies within the Orbis Group, some of which are located overseas in Bermuda, Canada, Hong Kong, Luxembourg, South Africa, United Kingdom and the United States. Personal information shared within the Orbis Group will be strictly used for the purposes for which it was collected and will be maintained in accordance with the Orbis Group's Privacy Policy instead of the Australian Privacy Principles, and
- third parties that perform processing, servicing functions or assist in client relationship management (such as the Orbis fund's unit registrar and responsible entity or your external adviser).

Can personal information be given to anyone else?

We do not sell, rent or trade personal information to, or with, third parties. In some exceptional circumstances personal information may be disclosed without obtaining your consent or prior notification to you. This includes where disclosure is required by law enforcement agencies, government agencies, courts or according to applicable laws.

We may also send you educational and marketing material about our other products and services which may be of interest for you. You can contact us at any time to ask us not to send this information.

Your access to your personal information

You can access most of the personal information we hold and request changes. However, this right is subject to certain exceptions. For example, you may be unable to obtain access to person information which would reveal personal information about another person or we are prevented by law from disclosing such information.

If you have any complaints or questions about this privacy policy or wish to access and/or correct your personal information, please contact us using the details provided below:

Email: clientservices.au@orbis.com
Phone: 1300 804 804 (within Australia)
+612 8224 8605 (outside Australia)

ORBIS GROUP PRIVACY POLICY

Our relationship with our clients is our most important asset. We understand that clients entrust us with their private information. Please take a moment to read about the steps we take to maintain that trust and our approach to privacy.

How and why we obtain personal information

In order to provide financial products and services to our clients efficiently and accurately and to comply with legal obligations, we* may collect non-public personal information about our clients and former clients from the following sources: (1) information we receive from Orbis Fund documentation, including applications or other forms and (2) information about clients' transactions with the Orbis Group and others (including information such as clients' holdings and transaction activity).

* Investors in Orbis SICAV should note that Orbis SICAV is the data controller under Luxembourg law of 2 August 2002 on the protection of persons with regard to the processing of personal data.

Our use of personal information

We maintain physical, electronic, and procedural safeguards to protect clients' non-public personal information. We do not sell clients' non-public personal information to anyone. By continuing to remain invested in Orbis Funds, clients consent to their personal data being transferred to Orbis Investment Advisory Pty Limited in Australia, Orbis Investment Advisory Limited in the UK, Orbis Investment Management Limited and Orbis Investment Management (B.V.I.) Limited in Bermuda and in the USA and to third party service providers based in Luxembourg, the United Kingdom, Bermuda, South Africa and Canada, other existing and future Orbis entities and service providers and their affiliates and to any successors agents or delegates carrying out their functions which may be persons based outside those jurisdictions. The transferred data comprise the information supplied on the original application forms and switch/redemption/transfer forms, identification documentation and transaction and account related instructions such as address changes, contract notes and trade confirmations. Such transfers take place in order to provide clients with the requested services or information efficiently and to comply with legal requirements. When such transfers take place, regulatory or tax or foreign exchange authorities or law enforcement officials in the jurisdictions to which any data is transferred may compel the disclosure of such information.

Investors in Orbis SICAV should refer to the Data Protection section of the Orbis SICAV prospectus for a more detailed description of the treatment of their personal information and their rights under Luxembourg law.

Except under limited circumstances described herein, all entities to which personal data are transferred are required to maintain the confidentiality of such information to the extent they receive it, and to use the information only in the course of providing such services. Entities to which personal data are transferred may not disclose clients' non-public personal data to persons other than those identified in the previous paragraph except in the following circumstances:

- as necessary to provide the services that the client has requested or authorised, or to maintain and service the client's account;
- as required by regulatory or tax or foreign exchange authorities or law enforcement officials who have jurisdiction over the entity, or otherwise as required by applicable law; or
- to the extent reasonably necessary to prevent fraud and unauthorised transactions.