



Confidentiality and Privacy Policy

1. Our Tikanga guides us

We are committed to ensuring that all our people, including our directors, employees and contingent workers, preserve and respect the confidentiality of our company, employee and customer information. Our information is a valuable corporate asset and effective dissemination, and protection, of information is important to our business success.

2. Application

This policy applies to all directors, and all employees (including any secondee, contractor or consultant) of Contact and its subsidiaries (collectively 'employees').

It also includes any suppliers who have access to confidential, proprietary or personal information in relation to Contact's operation, employees or customers.

3. Confidential and Proprietary information

Confidential information is information that we consider private and that is not generally available outside the company – this includes information about our customers and people, pricing information, and strategy or general business information.

Proprietary information is information that we own, develop, pay to have developed or to which we have an exclusive right.

Other than in the context of carrying out genuine business tasks, our people must not disclose or take confidential and proprietary information.

If any confidential or proprietary information needs to be shared with a third party, we expect that you will consult with the legal team to ensure that appropriate precautions are taken, such as the signing of a confidentiality agreement.

Information that is not public, and that may have an impact on our share price if disclosed is also subject to Contact's Continuous Disclosure Policy and the Securities Trading Policy.

4. Privacy

We expect all our people to comply with the Privacy Principles set out in the Privacy Act 1993 in relation to all personal information we hold, whether that relates to customers or our people.

The Privacy Principles cover the collection, use, access to, disclosure, storage, security and retention of personal information. **Personal information** is any information about an identifiable individual, and includes information that can be matched with other information to identify an individual.

We expect that all our people who have and use personal and confidential information will take appropriate steps to ensure the security of that information which includes appropriate storage and may include encrypting and password protecting any personal information.

We expect all our people and suppliers who have access to, who use or collect personal information held by Contact to complete any required training modules as soon as possible when joining us, so that they understand their obligations, and refresh that training regularly. We expect our people to ensure that any potential breach of the Privacy Principles is escalated appropriately (to your manager in the first instance) and is brought to the attention of our privacy officers. We have two privacy officers at any one time, one in the Legal team, and one in the Customer group. Details of the current privacy officers can be obtained from the General Counsel.

Because confidentiality and privacy are so important to Contact's reputation and success, we expect that any known or potential breaches of this policy will be reported to your manager, our privacy officers, the Legal team or the General Counsel if appropriate.

5. Related documents

Privacy policy in relation to use of our website. Our online privacy policy applies to individuals who use the Contact website. This policy can be viewed on our [website](#).

Our general terms and conditions for residential and business customers include terms and conditions relating to privacy, these can be viewed on our [website](#).

6. Compliance

Contact requires all of its employees and directors to comply with this policy. Compliance with this policy will be periodically monitored by the General Counsel.

Any known or suspected instances of non-compliance should be discussed with your manager, your Leadership Team member, or the General Counsel. Alternatively, any employee who is aware of a breach of this policy can take action in accordance with Contact's [Protected Disclosures \(Whistleblowing\) Policy](#).

7. Document control

Approved: July 2020

Document owner: General Counsel, Governance