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## Confidentiality Policy

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### Scope

This policy applies to all employees of Flashbay Pty Ltd.

'Flashbay' refers to all global Flashbay entities for the purposes of this document including Flashbay Ltd, Flashbay Inc, Flashbay Pty Ltd and Flashbay PH.

### Purpose

Any information that an employee learns about Flashbay or its customers, as a result of working for Flashbay Pty Ltd that is not otherwise publicly available constitutes confidential information. Employees may not disclose confidential information to anyone who is not employed by Flashbay or to other persons employed by Flashbay who do not need to know such information to assist in rendering services.

The disclosure, distribution, electronic transmission or copying of Flashbay's confidential information is prohibited. Any employee who discloses confidential information will be subject to disciplinary action (including possible dismissal), even if he or she does not benefit from the disclosure of such information.

### Acknowledgement by you

You acknowledge and agree that:

- all Confidential Information is confidential
- it would be detrimental to the business interests of the Company if any of the Confidential Information was used or disclosed by you other than as permitted by the Company

### Handling Confidential Information

You must:

- keep the Confidential Information confidential and not disclose it to any other person except in the proper course of the carrying out of your duties or for obtaining professional advice from a person who is obliged to keep the Confidential Information confidential.
- use Confidential Information solely for the purposes of the business and any other purpose that the Company may approve in writing from time to time
- if required by the Company, deliver all or any Confidential Information in your possession or control to the Company

### Disclosure of Confidential Information

You may disclose Confidential Information which you are required to disclose by law but only if:

- the extent and manner of the disclosure is strictly limited to that required by law; and
- you have given the Company as much prior notice as is reasonable of such disclosure

### After Termination of Your Employment

Your obligations under this clause continue to have full force and effect after the conclusion of your employment relationship with the Company.

### Monitoring this policy

It is important to note that the Company may vary or amend this policy from time to time particularly to take account of changes in the law, best practice or business requirements. This document shall be revised by the appropriate person, the HR Manager or nominated deputy. You will be notified of any changes.