

SUMMARY OF GENTRACK GROUP'S BINDING CORPORATE RULES FOR DATA PRIVACY AND PROTECTION

Gentrack Group Limited provides essential software for essential services, pairing powerful platforms with deep market knowledge to help utilities and airports lower service costs, foster innovation and confidently navigate market reform.

Gentrack Group Limited employs about 500 people in offices across New Zealand, Australia, the UK and Europe and services over 200 utility and airport sites in 20 countries with its leading solutions. It is the ultimate parent company of all Gentrack Group companies and is headquartered in New Zealand.

Gentrack Group has a Global Privacy Policy which is designed to reflect Gentrack Group's continuing commitment to privacy and data protection compliance. The Global Privacy Policy, together with Gentrack Group's internal policies and other key documents, now constitute Gentrack Group's Binding Corporate Rules for Data Privacy and Protection ("**BCRs**").

The BCRs express the commitment of our employees, Executive Leadership Team and Board of Directors to data privacy to protecting all information relating to identified or identifiable natural individuals (known as "**Data Subjects**"). Gentrack Group processes certain information about Data Subjects while operating its business (known as "**Personal Data**"). Gentrack Group is committed to ensuring adequate protection for transfers of Personal Data between and among Gentrack Group companies. The BCRs set out Gentrack Group's overall approach to privacy and data protection and emphasize the key role our employees play in protecting Personal Data.

Data protection laws give Data Subjects certain rights regarding how their Personal Data is handled. As a global company, Gentrack Group's use of Personal Data is subject to a variety of laws. In some countries, especially in Europe, Personal Data may not be transferred outside a country or region without demonstration of adequate data protection being in place prior to the transfer. Having and following BCRs is one method that Gentrack Group is using to comply with such laws and transfer restrictions.

Gentrack Group's BCRs are a company-wide global privacy policy based on European data protection laws and standards and are enforceable by third parties⁽¹⁾. The BCRs contain rules and guidelines to be followed by all Gentrack Group employees and contractors.

(1) – Third parties such as Gentrack customers whose EU end customer data is covered by Gentrack 24x7 support