

## Internal Information Sharing Policy

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| <b>Policy</b>         | SUB-INF: Internal Information Sharing Policy |
| <b>Version</b>        | Version 2.0                                  |
| <b>Date in force</b>  | November 2016                                |
| <b>Reviewed</b>       | March 2018                                   |
| <b>Planned review</b> | November 2019                                |

### Purpose

It has been agreed that any subsidiary or business unit of InternetNZ should maintain a policy on information sharing with the other subsidiaries or business units. This is that policy.

### Scope

This policy only applies to information that InternetNZ already collects as an ordinary part of its work.

The responsibility to ensure this policy is carried out rests with the Chief Executive, or the senior manager relevant to the subsidiary or business unit. That is, the responsibilities set out here are not imposed on individual Council members, though to the extent it is reasonable they are encouraged to act consistent with this policy.

### Outcomes

The intended outcomes of information sharing are:

- To maintain an efficient and productive working relationship across the three business units.
- To enable each business unit to correctly plan their work and effectively respond to the changing environment.
- To provide all business units confidence that they are working towards common goals.
- To prevent problems from arising or to mitigate the impact of any problems that arise across the business units.

### General Approach

InternetNZ will share all information needed to deliver the outcomes set out above.

In particular, InternetNZ will share information that any subsidiary or business unit:

- Needs to know; or
- Would expect to have shared with them in compliance with other group policies; or
- Would be disappointed not to have had shared with them.

## Exceptions

Information might be shared if it falls into any of the following categories:

- Information that needs to be kept confidential for legal reasons.
- Information that needs to be kept confidential for current commercial reasons.
- Information that has been provided by a third party to whom a commitment of confidentiality has been given.
- Information at such an early stage of development that sharing it may undermine the process in which it is developed.
- Information at a level of detail that sharing it would be contrary to best practice and/or undermine the responsibilities of Council members and of management.
- Information relating to InternetNZ's ownership interests in subsidiary companies or systemic role as steward for .nz (that is not yet ready for sharing with other business units).
- Private or confidential information about members or about staff/contractors (personnel issues).