

Confidentiality Policy

The company's confidentiality policy regulates the disclosure of important information that the company may come across.

Employees will unavoidably be exposed to personal and private information of clients and the company.

This policy is intended to set the framework within which information will be protected from exposure.

The Policy affects all employees and others that may have access to confidential information, such as board members, investors, and other third parties.

Confidential information include the following:

- Customer lists
- Data of Service Providers
- Trade secrets
- Private transactions
- Financial and other information
- Processes, methods and know-how
- Pricing/marketing and other undisclosed strategies
- All knowledge attained by employees during their employment
- Data entrusted to the company by all external parties

Any breach of the policy will face a serious disciplinary matter for the individual concerned. This could constitute gross misconduct for which an offending employee who willfully breaches our confidentiality policy may be dismissed without notice.

Any unintentional breach of this policy will also be investigated and appropriate disciplinary action will be taken depending of frequency and seriousness. The policy is binding after separation of employment.

Confidentiality Measures

- No information will be shared with anyone outside of the organization.
- The disclosure of information inside the organization will be limited to those with authorized access and legitimate reason to require that information.
- The information will not be used for the personal benefit or profit of the employee or any other except the company.
- Employees will have access only to information required for the completion of their job responsibilities.
- When reading or sharing information through electronic means, all precautionary safety measures must be in effect.
- Confidential information must not be left unattended.
- Unauthorized replication of information is prohibited.
- All copies of confidential documents must be shredded when no longer needed.
- Employees will sign non-disclosure agreements.
- Automatic screen locking after a few minutes of inactivity will be mandatory.
- Databases will be protected with available security measures;
- Authorization of access will be carefully controlled.

Confidential information may only be disclosed to third parties on request by a regulatory body where an investigation or audit is conducted.



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CRAIG MACDONALD

DATE:



KI & REPRESENTATIVE