# Managing confidential information policy

## Governance

BeZero

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#### Managing confidential information policy

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Please direct any questions to the Chief Operating Officer (COO) or VP Operations if you have concerns about this Policy and how it applies to you.

#### Introduction

While conducting business activities, BeZero Carbon and its employees may be exposed to confidential information. BeZero Carbon and its employees are committed to safeguarding Confidential Information by enforcing strict restrictions on its usage and management. This policy outlines the measures that are in place to prevent the unauthorised sharing of Confidential Information.

All employees of BeZero Carbon are required to be aware of, acknowledge and adhere to the requirements of this policy. All employees must report any disclosures to unauthorised persons immediately.

### Definitions

Confidential Information: Any non-public information, whether written, electronic, or oral, that is disclosed to BeZero Carbon by a client, partner, or employee that is designated as confidential or that a reasonable person would understand to be confidential.

Unauthorised Access and Disclosure: The use of and / or release/dissemination of Confidential Information to any individual or entity not authorised to access such Confidential Information.

#### Scope

This policy applies to all employees, contractors, consultants, temporary staff, and other workers at BeZero Carbon.

#### Storage

BeZero Carbon utilises industry-leading systems and processes to secure and manage its data. When handling Confidential Information, additional provisions are enforced to ensure that this data remains private and that data handlers are aware of its confidential nature.

All information systems that BeZero uses in the processing of Confidential Information must meet the data security and privacy standards that it requires for its own Confidential Information.

Data Encryption: All Confidential Information is encrypted both at rest and in transit.

Data Deletion: Confidential Information can be deleted from internal systems upon request or will be deleted in accordance with client agreements.

Physical Security: The physical security of internal infrastructure is managed by Azure. All assets are governed by the Conditions of Use of IT Facilities Policy.

BeZero Carbon has implemented a Code of Conduct that all employees are required to follow. Employees must handle and process information appropriately and securely, adhering to industry standards and best practices to ensure all information is protected. Employees must also comply with any data security requirements specified in client contractual agreements.

#### Access controls

BeZero Carbon uses specific systems and folders to store, manage, and process Confidential Information. Requests for access to specific folders and drives must be approved by authorised administrators and granted on a 'need to know' basis.

Access is managed centrally and can only be granted by authorised personnel with administrator privileges.

Employees who have access to Confidential Information are not permitted to use the information for any purpose other than that for which it was provided.

### **Compliance and monitoring**

BeZero Carbon will conduct regular audits to ensure compliance with this policy. Non-compliance may result in disciplinary action, up to and including termination of employment. Additionally, BeZero Carbon will provide ongoing training to employees to ensure understanding and compliance with this policy.

#### **Reporting and incident management**

Employees must report any suspected breaches of this policy to the Chief Operating Officer (COO) or VP of Operations immediately. BeZero Carbon will investigate all reported incidents and take appropriate action, including notifying affected parties if required.

### Legal compliance

BeZero Carbon complies with all applicable data protection laws and regulations, including but not limited to the General Data Protection Regulation (GDPR). All employees must adhere to these regulations when handling confidential information.

### **Review and amendments**

This policy will be reviewed annually and updated as necessary to ensure continued compliance with legal and regulatory requirements, as well as to incorporate best practices in data security and management.

#### **Updates and reviews**

| Version number | Date     | Description           |
|----------------|----------|-----------------------|
| 1.00           | 07/03/24 | Initial release       |
| 1.01           | 31/05/24 | Minor content updates |

#### Disclaimer

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