

## **Confidentiality Policy**

### **Purpose**

In carrying out the Company's business, Directors, Employees and agents often learn confidential or proprietary information about the Company, its customers, suppliers or joint venture partners. This Policy prohibits the unauthorized disclosure or use of confidential or proprietary information about the Company, its customers, suppliers or joint venture partners.

### **Policy**

No Director, Employee or agent entrusted with or otherwise knowledgeable about information of a confidential or proprietary nature shall disclose or use that information outside the Company or for personal gain, either during or after employment or other service to the Company, without the valid and proper written Company authorization to do so given by a manager or employee with the authority to release confidential or proprietary information. An unauthorized disclosure could be harmful to the Company or helpful to a competitor.

The Company also works with joint venture partners', suppliers' and customers' proprietary data. The protection of such data is of the highest importance and must be discharged with the greatest care for the Company to merit the continued confidence of such persons.

No Director, Employee or agent shall disclose or use confidential or proprietary information owned by someone other than the Company to non-directors or non-employees without Company authorization, nor shall any such person disclose the information to others unless a need-to-know basis is established.

Certain Employees are required to sign at time of employment a proprietary information agreement that restricts disclosure of proprietary, trade secret and certain other information about the Company, its joint venture partners, suppliers and customers. This Policy applies to all Directors, Employees and agents without regard to whether such agreements have been signed or not.

### **Policy Statement**

Sinntec is committed to protecting all information received in the course of providing our services

All information received during the course of providing a services shall be treated as business confidential to the extend the same is not published or otherwise in the public domain.

Sinntec believes that:

- i. the principles of confidentiality must be applied to all aspects of its service and management
- ii. its clients have a right to confidentiality in order to protect their interests

## Policy Definition

Sinntec understands confidentiality to mean that no information regarding a service, or client shall be given directly or indirectly to any third party who is external and / or to a person who may not need such information for the normal conduct of the services to be provided by Sinntec to its client without the clients prior expressed consent to disclose such information. However with the exception of any information which we are legally bound to divulge to any authority, government or otherwise or information which are already published or is part of the public domain.

Sinntec also recognises that information may be directly given out to the inspectors, consultants, advisers, or other staff for providing the services to its clients and all members should ensure that no information relating to a service or the client is supplied to any other person without express consent of Sinntec or to the limited extend of information which will be needed for the purpose of conducting any Inspection or providing any service.

Sinntec further recognises that all business confidential matters shall be treated so, that the confidentiality of the information supplied by the clients are protected and steps will be taken to ensure that no breach of confidentiality can occur inadvertently.

## Policy Implementation

All employees, Inspectors, consultants and advisers of Sinntec shall commit themselves to these policies by signing an agreement, or by specific contractual provision or by any other legal and appropriate means.

It will be the responsibility of all employees, Inspectors, consultants and advisers of Sinntec to protect confidential information by implementing the procedures prescribed for the same so that:-

- iii. Access is restricted to authorised personals only.
- iv. Documents are stored in the designated secure areas and are disposed of in a secure manner.
- v. Shall not try to make personal profit from any information obtained in the course of your employment or service.

Further all those using or collecting the information is to abide by certain key principles.

- vi. All information including any personal or business information shall be:-
  - a. obtained and processed fairly and lawfully
  - b. held for the lawful purpose
  - c. used only for those purposes, and disclosed only to appropriate people
  - d. adequate, relevant and not excessive in relation to the purpose for which they are held
  - e. accurate and where necessary, kept up-to-date
  - f. held no longer than is necessary
  - g. and be safeguarded.