



Confidentiality and Non-disclosure policy

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Ergo Confidentiality and Non-disclosure policy

Introduction

This *Confidentiality and Non-disclosure Policy* sets out the expectations and obligations on Ergo consultants and associate employees (hereafter referred to as consultants). It is expected that the consultant will adhere to the policy, and understand his or her role in keeping confidential, proprietary and sensitive information.

Why confidentiality is important to Ergo

Through Ergo's work, our consultants are often given privileged access to confidential or sensitive information. This information may be about the ways the client organisation works, future plans for products or services, or sensitive personnel or client data. In many cases it is only possible for Ergo to work effectively with clients by internally exchanging this type of confidential or sensitive information. Ergo takes significant steps to safeguard this information, including the following:

- all of our consultants are given training on managing confidentiality throughout a client engagement
- our consultants sign a confidentiality and non-disclosure agreement detailing the need for confidentiality and the serious consequences of any breach
- Ergo has appointed a client lead for policy issues covering confidentiality and non-disclosure: Mark Rapley
- Ergo has detailed data security processes for obtaining, storing and disposing of confidential or sensitive data.

Security of data

We understand it is critical for Ergo to take steps to maintain the security of data received from our clients in confidence. All our consultants operate a range of IT and operational security procedures:

- secure login identification for using IT systems — each time our consultants access Ergo data, they are required to sign in using personalised password identification
- logical access controls — we limit access to information so that only consultants needing data to be able to deliver their client work, are given access to sensitive information
- protecting Ergo IT systems — Ergo's IT systems operate behind a firewall, and use encrypted storage of data. We work with one of the world's leading IT service providers, which offers us state of the art security functionality
- ensuring continuous operations — we have a detailed business continuity policy in place which encompasses: secure, encrypted, data backup; offsite storage; original record handling; secure disposal
- we limit the amount of paper-based confidential or sensitive data our consultants hold: any necessary confidential or sensitive paper records are kept in secure storage.

We place the following duty on all our staff.

Confidentiality

The consultant shall, during their engagement keep with inviolable secrecy and shall not reveal, disclose or publish to any person other than the Chief Executive and the Directors and the employees of the Commissioner or anybody named by them, any matters concerning the financial relationship between the Consultant and the Commissioner and shall not use for their own purposes or for any purpose other than those of the Commissioner any information of a confidential nature which they may acquire or may have acquired in relation to the business or affairs of the Commissioner.

The Consultant shall adhere to confidentiality arrangements as published and/or operated by the commissioner. This should be taken to include any evidence of abuse (for instance those that might

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arise from child protection policies held by the commissioner). The Consultant should report any such matters arising immediately to the commissioner.

You can find further details of confidentiality, non-disclosure and Ergo's ethical approach to work at ergoclear.com and in our Code of Practice.

Non-disclosure

Each Ergo consultant signs our non-disclosure policy. A copy is included below and states:

I agree that I will hold confidentially any and all knowledge or information that I may obtain in the course of my employment with Ergo Consulting Limited (Ergo) or from working with Ergo's clients and with respect to the secret processes, formulae, machinery, plans, sensitive or personal information etc. used by Ergo or Ergo's clients in delivering its services.

I will keep confidential information so long as that information remains confidential and is not otherwise available in the public domain.

I will not engage as employer, employee, principal, agent, or otherwise, directly, in any matching business within one calendar year of terminating my contract with Ergo.

I will not impart the knowledge specifically acquired through this employment with Ergo to anybody and if I at any time leave the employ of Ergo I agree not to enter into the employ or service or otherwise act in aid of the business of any rival company or concern or individual engaged in matching lines of business for a period of one year.

If I do so in violation Ergo will be entitled to compensation by any competent court enjoining and restraining me and every other person concerned from continuance of employment, services or other acts in aid of the business of the rival company or concern. Nothing will prevent me, upon the termination of the employment, in engaging in any occupation in which the confidential or personal data, proprietary processes, formulas, and other secrets of the employer will not be directly involved.

If you have any concerns, about confidentiality or non-disclosure, contact Ergo's policy lead, Mark Rapley m.rapley@ergoclear.com If you are unable to contact Mark Rapley, you can contact Dr Simon Sandberg s.sandberg@ergoclear.com

This policy may be updated from time to time. Up to date copies are available from ergoclear.com

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