

## Confidentiality Policy

All employees of CREAM Of the Crop have an obligation to abide by this Confidentiality Policy. CREAM Of the Crop ensures all personnel documentation and client documentation is securely stored at all times.

For the purpose of this Policy, "confidential information" is defined as:

- > the names, details and information relating to the business affairs of the candidates, clients or members of CREAM Of the Crop;
- > Files, documents, literature, matters of a technical nature, trade secrets, technical data, marketing procedures and information, accounting programs and procedures, financial information, strategic and business plans and like information relating to the business of CREAM Of the Crop;
- > other information which CREAM Of the Crop informs the employee is confidential or which, if disclosed, the employee knows or ought reasonably to know, would be detrimental to CREAM Of the Crop; and
- > all other information which is imparted to the employee in circumstances which the employee knows or ought reasonably to know that the information is confidential to CREAM Of the Crop or any persons with whom CREAM Of the Crop is concerned, but excludes any information that is public knowledge.

The employee:

- > may use confidential information solely for the purposes of performing their duties as an employee of CREAM Of the Crop;
- > must keep confidential all confidential information; and
- > may only disclose confidential information to persons who are aware that the confidential information must be kept confidential and who have a need to know (but only to the extent that each person has a need to know).

The employee's obligation of maintaining confidentiality does not extend to confidential information that the law requires to be disclosed.

At the end of the employee's employment, the employee must return to CREAM Of the Crop all confidential information in material form;

- those parts of all notes and other records based on or incorporating confidential information;
- all copies of confidential information and notes and other records based on or incorporating confidential information; and
- all of CREAM Of the Crop property, in the employee's possession or control.
- No personal information regarding Clients & Carers will be disclosed to outside parties

The employee's obligation of confidentiality will continue after the end of the employee's employment in respect of all confidential information other than information forming part of the employee's stock of general skill and knowledge.

Any employee found to be in breach of this confidentiality obligation, whilst still employed by CREAM Of the Crop will be disciplined, and in serious instances, dismissed.

Any ex-employee found to be in breach of this confidentiality obligation may be subject to legal action being taken against them, dependant upon the circumstances of the breach.

This Policy will operate in conjunction with the contract of employment or letter of appointment for every employee employed by CREAM Of the Crop and must be signed by the employee prior to the commencement of employment.

CREAM Of the Crop office staff uphold our company confidentiality standards at all times. All hard copies of sensitive information are stored in a locked filing drawer.

Only CREAM Of the Crop office staff directly involved in providing of the Crop service have access to the Campaign Manager system, and this is protected by a login and password unique to each individual.

Furthermore, we also include an Confidentiality information sheet specific to a specific customer, (should particular circumstances dictate this), as part of the registration and induction process of staff working with these customers.