

## **CONFIDENTIALITY POLICY**

Number: SSA-POL-005

**Revision: 1** 

Date: 01/09/2025

## **Purpose**

The purpose of this Confidentiality Policy is to outline the Australian Steel Institute's (ASI) commitment to protect the confidentiality of the Steel Sustainability Australia (SSA) clients' information. We recognise the importance of safeguarding sensitive data and maintaining the trust of our clients.

## Scope

This policy applies to all members of the SSA Governing Committee, staff, employees and contractors who have access to SSA client information.

## **Policy Statement**

- 1. **Confidential Information Definition** Confidential information includes any data, documents, or communications related to our clients, including but not limited to personal information, financial data, business plans, and proprietary information.
- 2. **Obligation of Confidentiality** All employees and associates of ASI and SSA are required to treat client information as strictly confidential. This obligation extends beyond the duration of employment or engagement with the company.
- 3. **Access to Information** Access to confidential information is restricted to SSA authorised personnel who require such access to perform their job duties. Employees must ensure that any confidential information they handle is secured and not disclosed to unauthorised individuals.
- 4. **Use of Information** Confidential information may only be used for legitimate business purposes directly related to client services. It must not be used for personal gain or for any purpose that is not authorised by the client.
- 5. **Data Protection Measures** ASI implements appropriate technical and organisational measures to protect client information from unauthorised access, alteration, or disclosure. This includes data security, access to data by authorised whitelisted IP addresses, no storage of any credit card details, all credit card details are encrypted, and regular security scans.
- Disclosure Requirements Confidential information may only be disclosed when required by law or
  with the explicit consent of the client. In such cases, the client will be informed of the disclosure unless
  prohibited by law.
- 7. **Training and Awareness** All employees will receive training on this policy and the importance of maintaining confidentiality. Regular refreshers will be provided to ensure ongoing awareness.
- 8. **Reporting Violations** Any employee who becomes aware of a breach of this confidentiality policy must report it immediately to their supervisor or the designated compliance officer.
- 9. **Consequences of Violations** Violations of this policy may result in disciplinary action, up to and including termination of employment, as well as potential legal consequences.