

Document Title	
IMSPOL 04 Privacy and Confidentiality Policy	

## Privacy and Confidentiality Policy

Edge Group Pty Ltd (Edge Group) is a specialist consulting firm that offers Occupational Health, Safety and Environment (HSE), including laboratory, services to its clients.

During client contacts, Edge Group collects the following business-related information from its clients:

- Key/primary and invoice personnel contact details;
- Business details (e.g. ABN), etc); and
- Information (verbal, documented and photographic) related to the scope of work for which a request for proposal has been made to Edge Group.

If the client chooses not to provide the above information, Edge Group may not be able to provide the client with the services it requires.

Once commissioned by the client, Edge Group collects client information in a number of ways including:

- Directly when information is provided in person (through interviews, telephone calls, etc), via site visits (observations, photographs, etc), or in documents such as previous reports, questionnaires, performance and monitoring data, etc or correspondence such as emails, phone calls, etc.;
- From publicly available sources of information (databases held by regulatory bodies, etc).

The information that Edge Group will collect about the client's business/operations, systems/processes, etc during the course of the scope of work will remain confidential to Edge Group and the client, the client's agent, or external regulatory bodies (e.g. EPA as required under law).

Edge Group shall inform the client in advance of the information it intends to place in the public domain. All information other than that which the client makes publicly available of their own accord, or when agreed between Edge Group and the client (e.g. for the purposes of responding to complaints), all other information is considered proprietary information and shall be regarded as confidential.

The Edge Group's laboratory services shall be responsible, through legally enforceable commitments, for the management of information obtained or created during the performance of the laboratory activities.

When Edge Group is required by law or authorised by contractual arrangements to release confidential information, the client or individual concerned shall, unless prohibited by law, be notified of the information provided.

Information about the client obtained from sources other than the client (e.g. complainant, regulators, etc) shall be confidential between the source and Edge Group. The provider (source) of this information shall be confidential to Edge Group and shall not be shared with the client, unless agreed by the source.

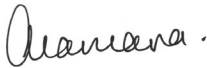
Personnel including any contractors, personnel of external bodies, or individuals acting on Edge Group's behalf, shall keep confidential all information obtained or created during the performance of its scope of work for the client, except as required by law. In general, and whether within a client scope of work or otherwise, such personnel are required to take special care to secure all records and to prevent unauthorised disclosure of any Edge Group or other business information. Client contact information is particularly sensitive as Edge Group's clients have a legal right to expect information held about them to be held in utmost confidence (that is, the information that does not specifically relate to Edge Group's scope of work for the client – e.g. personal, financial solvency, etc).

Edge Group treats the personal data of its personnel including any contractors, personnel of external bodies, or individuals acting on Edge Group's behalf, in the same way as it does with its client data above.

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All Edge Group employees are made aware of the policy and working within it is encouraged at all levels within the organisation.



Anthony Caruana  
 Managing Director  
 Dated: 24 October 2018

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