

## Client & Data Privacy and Confidentiality Policy

Version: 1.0

Approval Date: 7 April 2026

Approved By: Board of Directors

Next Review Date: 7 April 2027

---

### 1. Purpose

Bellandaine is committed to protecting the privacy, confidentiality and security of our clients and the information they share with us.

This policy sets out the standards expected of all employees, contractors and directors when handling client information, personal data and commercially sensitive material.

Our approach aligns with the requirements of the *Privacy Act 1988 (Australia)* and the *Australian Privacy Principles*, as well as recognised professional standards of confidentiality.

### 2. Scope

This policy applies to all employees, directors and contractors, and to all client, business and personal information obtained through our work.

It applies whether work is undertaken in the office, remotely, or at a client site.

### 3. Confidential Information

Confidential information includes any non-public information relating to our clients, their projects, their business activities, or individuals connected to those activities.

This may include reports, financial or commercial information, project documentation, personal information, and internal analysis or advice.

### 4. Responsibilities

All team members must:

- Treat client information as confidential unless authorized to share it
- Only access information needed to perform their role
- Keep documents, devices and systems secure
- Avoid discussing client matters in public places or on social media
- Report any suspected data breach or loss of information immediately

## 5. Protecting Information

Bellandaine will take all reasonable steps to protect client and personal information by:

- Using secure systems and password-protected devices
- Limiting access to sensitive information
- Storing and sharing files using secure methods

Staff should not store confidential client information on unauthorized personal devices or storage systems.

When working outside the office, staff must take care to ensure that:

- Devices and documents remain secure
- Screens and conversations cannot be accessed, viewed or overheard by others
- Client information is not left unattended

## 6. Breaches

Any breach of client confidentiality directly impacts our reputation in the market as a trusted partner and must be treated with the highest level of seriousness. As such, any suspected loss, unauthorized access, or disclosure of confidential information must be reported to management immediately.

Failure to comply with this policy may result in disciplinary action.

We will monitor our performance through regular audits and incident investigations. This policy will be reviewed annually to ensure it remains relevant to our operations and compliant with legislation.

