



Confidentiality Policy

V1.0 – December 2021

Bonsucro is committed to the highest standards of information security and treats confidentiality and data security extremely seriously to protect the privacy of its members, employees, auditors, non-industry committee members, other stakeholders and the integrity of Bonsucro. Confidentiality is one of the key principles underpinning Bonsucro's activities and is central to the trust between Bonsucro and its stakeholders.

The purpose of this Confidentiality Policy is to lay down the principles that must be observed by all who work at Bonsucro and have access to confidential information, including members of Bonsucro's governance.

All contracts with any third parties that work with Bonsucro contain a Confidentiality clause based on this policy and any other specific confidentiality obligation.

Bonsucro also has a Privacy Policy that covers how personal data (information relating to an individual who can be identified - directly or indirectly - from that information) is collected and used and you can find all the details in the policy published on our website [here](#). This Confidentiality Policy focuses on **business and confidential information and integrates with our Privacy Policy**. Together they contain the key rules we follow at Bonsucro in relation to data protection and privacy.

Scope of this policy

This policy applies to all staff and members of the governance bodies who must be familiar with this policy and comply with its terms.

The information covered by this policy includes all written, spoken and electronic information held, used or transmitted by or in whatever media. This includes information held on computer systems, removable storage devices for example CD/DVD or USB sticks, hand-held devices, phones, paper records.

Definitions

Bonsucro information covered by this policy includes:

- business information; and
- confidential information.

For the purposes of this Policy:

Business information	means business-related information other than personal information regarding members, clients, suppliers and other business contacts of Bonsucro.
Confidential information	<p>means confidential information or trade secrets (either belonging to Bonsucro or to third parties) that is collected, processed and/or stored by Bonsucro and includes:</p> <ul style="list-style-type: none">▪ Commercially sensitive information as defined by the Antitrust Policy Statement;▪ Dues paid by members.▪ Auditors' certification recommendations and summary reports.▪ Non-compliances/non compliances against certain provisions of the standards.▪ Oversight assessment reports (member company name and details of the Bonsucro witnessed audit).▪ Information collected about an individual member performance▪ Information about member management systems, performance and certification collected by way of surveys or during in-house or external research.▪ Information submitted or gathered in connection with the investigation of a complaint under Bonsucro's Grievance Mechanism (please see specific information on this in the Grievance Mechanism Rules).▪ Information related to disciplinary proceedings against members or auditors.▪ Information collected during Bonsucro's due diligence process of members/applicant members▪ Information covered by confidentiality agreements. <p>Any other information that is provided in confidence, or would be reasonably considered to be confidential based on generally accepted ethical and business practice</p>

Principles of this Policy

This policy covers confidential information relating to Bonsucro's activities. It is based on the premise that all such information should be treated as confidential and on the principles described below:

1. Confidential Information is subject to a legal duty of confidence. In addition to the requirement of their contractual responsibilities, all staff working for Bonsucro are bound by a legal duty of confidence to protect confidential and personal information they may come into contact with during the course of their work, as per the Common Law Duty of Confidentiality.
2. All Confidential Information is to be treated as commercially valuable and protected from loss, theft, misuse or inappropriate access or disclosure.
3. Confidential Information, must be protected against unauthorised and/or unlawful processing and against accidental loss, destruction or damage, by the use of appropriate technical and organisational measures.
4. Confidential Information is disclosed to colleagues and other professionals/agencies on a need-to-know basis, when there is a clear, legitimate reason for doing so and contractual agreements are in place that include confidentiality agreements. Obligations under specific Non-Disclosure Agreements should be followed in relation to allowed disclosure to personnel and advisors.
5. Confidential Information must be used only in connection with work being carried out for Bonsucro and not for other commercial, or non-commercial or personal purposes.
6. Confidential Information must be used only for the specified, explicit and legitimate purposes for which it is collected.
7. In addition, all information collected, used and stored by Bonsucro must be:
 - adequate, relevant and limited to what is necessary for the relevant purposes; and
 - kept accurate and up to date.
8. Personal information must be processed in accordance with Bonsucro's [Privacy Policy](#) and all other relevant policies.
9. Bonsucro will take appropriate technical and organisational measures to ensure that Confidential Information is kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction, or damage.
10. Where Bonsucro uses third parties to perform its activities, Confidential Information may be shared with them as required. In these cases, the same standards of confidentiality will apply and will be included in the relevant contractual agreements.

Retention Period

Confidential Information will be stored in accordance with contractual requirements or, where there is no such contractual requirement, for as long a period as reasonably necessary to fulfil Bonsucro's obligations

Application

Information security is the responsibility of all staff. Bonsucro's Data Governance Committee is responsible for:

- monitoring and implementing this policy.
- monitoring potential and actual security breaches.
- ensuring that staff and concerned parties are aware of their responsibilities

Breach of this Policy

Bonsucro takes compliance with this policy very seriously. Failure to comply with it puts both staff and Bonsucro at significant risk. The importance of this policy means that failure to comply with any requirement of it may lead to disciplinary action, which may result in dismissal or termination of the contract in the case of consultants and other third parties.

Review

Bonsucro will review and update this policy from time to time.

This policy was approved by:

Danielle Morley CEO

A handwritten signature in black ink, appearing to read 'Danielle Morley', written in a cursive style.

10th December 2021