

## IMS50 CLIENT CONFIDENTIALITY POLICY

This Policy covers any type of confidential information, oral, digital or physical, and may include commercial information, ideas, discoveries, inventions, drawings, specifications, plans, computer programmes, computer data, objects, samples, requirements etc. ("Confidential Information"), received from any customer or potential customer ("the Disclosing Party") in the course of tender for or the supply of any SMS Environmental products or associated services.

Our policy in connection with Confidential Information is as follows:

1. SMS Environmental is committed to preserving the confidentiality, integrity and availability of data supplied by, generated by and held on behalf of third parties for the purpose of carrying out of work agreed by contract in accordance with the requirements of information security standard certification ISO27001 and legislative requirements.
2. SMS Environmental shall inform the client, in advance, of the information it intends to place in the public domain. Except for information that the Disclosing Party makes publicly available, or when agreed between SMS Environmental and the Disclosing Party (e.g. for the purpose of responding to complaints), all other information is considered proprietary information and shall be regarded as confidential;
3. When SMS Environmental is required by law or authorised by contractual commitments to release confidential information, the Disclosing Party concerned shall, unless prohibited by law, be notified of the information provided;
4. Data about the client obtained from sources other than the client (e.g. complainant, regulators) shall be treated as confidential;
5. SMS Environmental employees are required to read and sign Confidentiality Policy agreement as a part of their Induction Process. This requirement serves as a preventative barrier against unintentional breach of Data Protection Act 1998 and General Data Protection Regulations 2018.
6. SMS Environmental Ltd is registered with The Information Commissioner's Office (ICO);
7. SMS Environmental will not seek to use or exploit any Confidential Information for any purpose other than for the carrying out of the service or the supply of the product or the tender for such service or product requested by the Disclosing Party.