



adaps

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INFORMATION DISCLOSURE POLICY

Ver 1.0

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1.0 Information Disclosure Policy

Adaps has put this policy in place to ensure staff are fully aware of their responsibilities when collecting and using confidential information and Customer Data. This policy is important as it should help you understand how to effectively maintain compliance with the Data Protection Act when handling information.

Information is an asset to a commissioning organisation. Information enables Adaps to make effective and informed decisions. Therefore, it is important to ensure we maximize the value of information as an 'asset' in compliance with legal requirements. In complying with this policy, we will ensure information is:

- Held securely and confidentially
- Obtained fairly and lawfully
- Recorded accurately and reliably
- Used effectively and ethically and
- Shared and disclosed appropriately and lawfully.

Adaps is committed to ensuring that information, in whatever its context, is processed as permitted by law, statute and best practice. Compliance with all Adaps' policies is a condition of employment and a breach of policy may result in disciplinary action.

During employment with Adaps, employees will learn, work with, and be entrusted with information and trade secrets that are confidential relating to Adaps' operations, proposed new businesses, financial condition, sales, products and designs. This information is not known outside of the company or even known to all Adaps employees. Examples include financial information, costs, business projections, marketing plans, customers, suppliers, designs, composites, sketches and any information that is marked confidential. Keeping this information confidential is necessary to ensure our success. Because this information has substantial value to Adaps, all employees must exercise the highest degree of care not to disclose any confidential information, even inadvertently (through conversations in elevators or restaurants), to any unauthorized persons in or outside the Company.

Employees, except within the scope of employment, cannot remove, make or cause to be made any copies of drawings, reports, correspondences or other writings or samples relating to the Company. Employees cannot use for their own gain or disclosure, except within the scope of employment, any trade secrets, other confidential information, data or knowledge relating to the Company.

Employees must surrender all documents, drawings and information to the Company upon termination or employment or at any time upon the request of their Supervisor. Sometimes even the most innocent acts or requests can result in disclosure of confidential information.

Employees should always think before discussing information with a third party. If an employee believes confidential information must be disclosed to a third party, they should consult with their

Department Head. There is no excuse for disclosure of our confidential information. The employee's obligations under this policy shall continue after termination of employment.

2.0 Disclosure

Adaps may choose to share any and all the above data to the following entities as may be necessary in the circumstances:

- Statutory Authorities as and when requested for the purpose of law enforcement or under provisions of applicable Laws
- Customers, when they make a request pertaining to their respective transactional information, business information that is mutually exchanged, Adaps data information that may be necessary for the customer to make any business decisions, but not information related to other customers.
- The information that is bound either by confidentiality or non-disclosure with third parties is not disclosed to Customers
- Any information / Data that has been approved in writing by the effected parties may be shared with other parties with appropriate and necessary approvals

3.0 Policy Standards

This policy document, as part of a suite of supporting Information Governance related policies, sets out the standards that those working for or on behalf of the Adaps are expected to adhere to when handling data or information.