

Responsible Jewellery Council



Confidentiality Policy

October 2008

Introduction

The Responsible Jewellery Council places a high priority on the protection of confidential information in order to protect the privacy of its Members and employees, and the integrity of the Council.

Principle of this Policy

Confidential Information shall only be accessible to those who are authorised to have access to the information.

Application

This policy applies to all directors, officers, employees, contractors and consultants.

Definition of Confidential Information

Confidential Information includes:

- Commercially sensitive information as defined by the Antitrust Policy Statement;
- Dues paid by Members;
- Auditors' Certification Recommendations and Summary Reports;
- Information submitted or gathered in connection with the investigation of a complaint under the RJC System or under the Whistleblower policy;
- Information related to disciplinary proceedings against Members or Auditors;
- Information covered by confidentiality agreements;
- Personnel records of RJC employees or any other information of a personal nature;
- Any other information that is provided in confidence, or would be reasonably considered to be confidential based on generally accepted ethical and business practice.

Duties

All directors, officers, employees, consultants and contractors who are in possession of Confidential Information shall ensure that they:

- are authorised to have access to the information; and
- take all reasonable actions to protect the security of the information, commensurate with the sensitivity of the information.

No person who is in possession of Confidential Information shall be subjected to pressure or intimidation to disclose the information to another party if they have reasonable grounds to believe that the other party is not authorised to receive the information.

If a person acquires unauthorised access to Confidential Information, they shall take immediate steps to delete or destroy the information, prevent any continued access to it, and, where applicable, inform the provider of the information that it was received without authorisation and has been deleted or destroyed.

Disciplinary Action

Any person who deliberately or negligently contravenes this policy may be subject to disciplinary action.

Approved: Matthew J Runci

Chairman, Responsible Jewellery Council