

Confidentiality and Data Protection Policy

Introduction

At Vistrol, we are committed to maintaining the highest standards of confidentiality and privacy in all aspects of our operations. We understand the importance of protecting sensitive information and are dedicated to safeguarding the data entrusted to us by our clients, employees, and partners.

Purpose

The purpose of this Confidentiality Statement and Policy is to establish clear guidelines for the handling, protection, and management of confidential information within Vistrol. This policy aims to ensure that all sensitive data is securely managed, and that confidentiality is maintained in accordance with applicable laws and regulations.

Scope

This policy applies to all employees, contractors, consultants, and any third parties who have access to confidential information in the course of their work with Vistrol.

Definition of Confidential Information

Confidential information includes, but is not limited to:

- Personal data of clients, employees, and partners.
- Financial records and proprietary business information.
- Trade secrets and intellectual property.
- Contractual agreements and negotiations.
- Any other information designated as confidential by the organization.

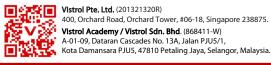
Responsibilities

Employees and Affiliates

- Employees and affiliates are required to handle confidential information with the utmost care and to ensure that such information is only shared with authorized individuals.
- Confidential information should not be discussed or shared outside the scope of authorized duties.
- Employees must adhere to all confidentiality agreements and policies in place.

Management

- Management is responsible for ensuring that confidentiality policies are communicated and enforced.
- Management must provide training and resources to employees to ensure compliance with confidentiality requirements.







Information Handling and Security

Access Control

- Access to confidential information is restricted to individuals who need it for their job functions
- Employees must use secure passwords and authentication methods to access confidential systems and data.

Data Storage and Transmission

- Confidential information must be stored securely using encryption and other protective measures.
- Data transmission must be conducted using secure channels to prevent unauthorized access.

Disposal of Information

 Confidential information must be disposed of in a secure manner, such as through shredding physical documents or securely deleting digital files.

Breach of Confidentiality

Reporting

Any suspected or actual breach of confidentiality must be reported immediately to HR or any of the Company Directors.

Investigation

All reported breaches will be investigated promptly, and appropriate action will be taken to address and mitigate the impact of the breach.

Disciplinary Actions

Violations of this confidentiality policy may result in disciplinary action, up to and including termination of employment or contractual agreements.

Training and Awareness

All employees and affiliates will receive training on confidentiality policies and best practices during their onboarding process and periodically thereafter.

Ongoing awareness initiatives will be conducted to reinforce the importance of confidentiality.

Review and Updates

This policy will be reviewed regularly and updated as necessary to ensure it remains effective and compliant with legal and regulatory requirements.

Arthur Manfred

Managing Director | Vistrol Group



