

## CONFIDENTIALITY POLICY

During the normal course of business, Sean Spence and Sean Spence & Associates Pty Ltd are privy to confidential and personal information from our clients. As part of our business processes, from time to time we may take notes (either written or electronic) and may record sessions for the sole purpose of reviewing the session, enabling clients to revisit the session, and providing advice.

We respect the privacy of our clients and maintain their personal and financial information as confidential. All records dealing with specific clients are treated as confidential.

It is the policy of Sean Spence & Associates Pty Ltd that employees will not disclose confidential information belonging to, or obtained through their affiliation with Sean Spence & Associates Pty Ltd and its clients to any person, including their relatives, friends, and business and professional associates, unless the specific client has authorised disclosure.

This policy is not intended to prevent disclosure where disclosure is required by law.

Our clients and other parties with whom we do business entrust Sean Spence & Associates Pty Ltd with important information relating to their personal lives and businesses. It is our policy that all information considered confidential will not be disclosed to external parties or to employees without a “need to know.”

Personal and financial information is considered confidential and will not be disclosed or discussed with anyone without permission or authorization from the client. Care shall also be taken to ensure that unauthorized individuals do not overhear any discussion of confidential information and that documents containing confidential information are not left in the open or inadvertently shared.

Electronic documents are maintained in a password and firewall protected environment and are fully deleted at the end of each engagement or within a year of creation unless required by the client organisation to be maintained beyond that for archive or legislative reasons. Confidential paper documents are maintained within a secure environment and are shredded or otherwise destroyed within one year of creation unless otherwise required by legislation (eg financial records).

This policy does not preclude specific arrangements to be made with any individual client or client organisation.

### Sean Spence

Director, Sean Spence & Associates Pty Ltd

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