

Confidentiality Policy

Version 2.0

13 Feb 2025

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Version Control

This Confidentiality Policy is subject to regular review and update to ensure that Plastics New Zealand Incorporated remains aligned with best practices in confidentiality management and complies with applicable legal and regulatory requirements. Updates may also reflect changes in organisational operations, technology use, or stakeholder expectations.

The AFR Committee is responsible for regular review of this policy and presenting to the Board for approval of any amendments and ratification.

Version	Date	Author	Status
V1.1	20 Nov 24	Rachel Barker	Initial draft
V2.0	13 Feb 25	Rachel Barker	Board Approved

1. Purpose

Plastics New Zealand (Plastics NZ) is committed to safeguarding all confidential information entrusted to us by members, employees, contractors, and other stakeholders. This policy defines the standards for handling confidential information in alignment with our Privacy Policy and organisational practices.

This policy complements the Privacy Policy, which governs personal data protection. Together, these policies form a comprehensive framework for information security and confidentiality.

2. Scope

This Confidentiality Policy applies to all employees, contractors, board members, and third-party representatives who have access to confidential information while working with Plastics NZ.

3. Definition of Confidential Information

Confidential information is any non-public data that, if disclosed, could negatively impact Plastics NZ, our members, or other stakeholders. It is categorised as follows:

- **Highly Sensitive:** Member financial or employment data, strategic goals, internal reports, proprietary research, internal business strategies and sensitive personal information.
- **Internal Use Only:** Operational data, meeting notes, membership or contact lists, and routine correspondence.
- **Public:** Information explicitly approved for publication or dissemination by Plastics NZ or its members.

This includes all information regardless of format, collected or generated by Plastics NZ in confidence.

4. Access and Handling of Confidential Information

Access to confidential information is managed to balance operational efficiency and the protection of sensitive data. Plastics NZ applies the principle of least privilege selectively, ensuring that access to high-risk or sensitive information, such as company revenue data, is restricted to authorised personnel. For less sensitive operational data, broader access is permitted to enable efficient cross-functional collaboration within the organisation.

All employees and contractors are expected to exercise diligence in safeguarding confidential information, following these practices:

- **Physical Security:** Confidential documents must be stored securely, with access to high-risk information restricted to authorised individuals. Documents should be locked when not in use, and discussions involving sensitive topics should take place in private settings.
- **Digital Security:** Digital records must be stored in secure systems that are password-protected and accessible only to those requiring them for their role. For particularly sensitive files, additional protections, such as individual file encryption or password protection, may be applied where appropriate. When no longer needed, digital files must be permanently deleted or securely removed from systems.
- **Remote Work:** When working remotely, employees are expected to secure all confidential documents. Access to digital data must be via secure encrypted devices – sharing over unsecured networks or personal devices is prohibited.

5. Information Sharing Protocols

Confidential information must only be shared internally with authorised personnel for legitimate purposes. External sharing is restricted to:

- Pre-approved disclosures for legitimate business needs.
- Situations required by law (e.g. court orders).

All external disclosures must be authorised by the CEO.

6. Non-Disclosure Requirements

Personnel must not disclose or discuss confidential information outside of authorised contexts. Exceptions include lawful disclosures, whistleblowing, or public interest cases, subject to prior CEO approval.

7. Confidentiality with Third Parties

When Plastics NZ needs to disclose confidential information to third parties (e.g. contractors, consultants or service providers), such parties must:

- Sign binding confidentiality agreements.
- Adhere to Plastics NZ's confidentiality protocols.

Plastics NZ will periodically review third-party compliance through audits or contract renewals.

8. Data Handling and Disposal

Personnel must handle and store confidential information responsibly. When it is no longer needed, confidential information should be securely disposed of, including shredding physical documents and permanently deleting digital files.

Confidential information is retained in line with legal and operational requirements:

9. Breaches of Confidentiality

Any actual or suspected breach of this policy must be reported immediately to the CEO or National President. Personnel are encouraged to self-report accidental disclosures.

Breaches involving personal data will be escalated and managed under the Privacy Policy.

Breaches may lead to disciplinary action, up to and including termination of employment or contract, and may result in legal action, depending on the severity of the breach.

10. Security Commitments

Plastics NZ is committed to implementing, assessing, and continuously improving effective security measures to protect confidential information from unauthorised access, disclosure, or misuse.

11. Training and Acknowledgement

All personnel with access to confidential information must acknowledge their understanding and commitment to this policy by signing a copy upon joining Plastics NZ and whenever the policy is updated. Plastics NZ will provide regular training and updates on confidentiality protocols, especially as new tools and technologies, including AI, are introduced.

12. Policy Review

This Confidentiality Policy will be reviewed annually or as needed to reflect changes in our practices or legal requirements. Employees and other personnel will be informed of any significant updates or amendments.

13. Contact for Queries:

For inquiries or concerns regarding this Policy, please contact:

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