

Easy Financial Services Limited

Client Information Confidentiality Policy

(01/04/2025)

The material collected and retained by Easy Financial Services Limited is confidential and sensitive. All advisers, staff and contractors must take extreme care to protect client privacy and abide by the relevant privacy legislation.

Easy Financial Services Limited considers it is important that all employees adhere to the following client confidentiality and privacy policy at all times. This policy is designed to implement and maintain client confidentiality and privacy that meets and exceeds current legislative requirements. We feel this enables our clients to feel confident that their private data is safely used, transmitted and stored.

- Personal information may be collected in respect to work conducted by Easy Financial Services Limited for various clients and organizations. A confidentiality agreement will be put in place, where necessary, between clients/suppliers/contractors and Easy Financial Services Limited.
- Personal information from sources other than the person concerned (or their authorized representative) may only be collected if it is publicly available information.
- When collecting information from a client, an employee needs to tell the client what will happen to their information and what their rights are.
- Information collected for one purpose may not be used for another purpose without the permission of the supplier of the information.
- Easy Financial Services Limited employees are to take all necessary steps to protect client information contained in paper and electronic files from loss, access by unauthorized persons and other misuse, by storing files in a safe location.
- The definition of a safe location (for paper files) is:
 - A burglar alarm in place
 - A fire alarm/smoke detectors in place
 - Files not being visible to unauthorized personnel.
- A clean desk policy is operated by Easy Financial Services Limited.
- No more than three client files may be removed from the office at any one time, unless being transferred from one safe location to another.
- Client files are not to be left unattended anywhere, including motor vehicles or other forms of transport.

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- All client files that are temporarily removed from an office are to be stamped 'confidential' and include clearly visible instructions on the cover that stipulate the contents of the file are confidential. In the event that the file comes into the possession of an unauthorized person, the file is to be returned to a specified address.
- All computers, mobile phones and file servers that contain client data are to be password protected.
- Off-site computer back-up data that contains client information is to be stored in a secure location (not kept in a motor vehicle).
- Client confidentiality and privacy procedures are reviewed annually.
- All employees must sign a confidentiality document relating to the disclosure or non-disclosure of client specific data. At present this is included in the employee's Employment Agreement.
- All clients of Easy Financial Services Limited are able to access their files on request. The information can either be viewed at the office at which the information is held, copies made of the information or forwarded to the client, or oral information may be given. Clients may request an update or correction of information on their file.
- Reasonable steps should be taken to check the accuracy of information before using it. Information should not be kept longer than is required.
- All outgoing emails and faxes are to contain confidentiality clauses. Care should be taken to ensure fax and email addresses are correct and that documents are not seen by others, such as when travelling on planes, etc.
- When forwarding broadcast emails to clients, staff must enter the recipients email address as 'BCC' and not in the 'TO' or 'CC' boxes.