

## **Confidentiality and Privacy Policy**

For: Bird Comm, a division of Code Technology Corp.

## Confidentiality

Our Company, including our staff, partners and sub-contractors, recognize that we will have access to and become acquainted with various facts, innovations, processes, information, records and specifications owned or licensed by our clients and/or used by the client in connection with the operation of its business. These include, without limitation, the client's business processes, proposals, methods, document templates, digital templates, stakeholder lists, financial information and procedures.

We agree to <u>not disclose</u> any client information, directly or indirectly, or use any information in any manner, either during the term of a contract engagement or at any time thereafter, except as required in the course of an engagement with the client. All files, records, e-mail records, documents, specifications, information, letters, notes, media lists, original artwork/creative, notebooks, and similar items relating to the business of the Client, whether prepared by the ourselves or otherwise coming into our possession, shall remain the exclusive property of the Client.

## Privacy

In addition to Client confidential information, the Company, its partners and its sub-contractors are aware of the need to protect personal information. In conducting our work for the client, we may become acquainted with personal information and pledge to maintain the privacy all individuals. Private and/or identifiable information includes: name, health record information, results and reports, diagnoses, biomarkers, etc.

If private information is to be shared in a publication, such as a feature story or widely shared business report, we will collect formal written approval from the individual (using either the Client's or our own consent forms) prior to publication in print or online.

## **Primacy**

The Company, its partners and its sub-contractors will abide by client confidentially and privacy policies, and any agreement terms negotiated for the engagement. Client policies and agreements signed by Bird Comm will take precedence over this Confidentiality and Privacy Policy.