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# CONFIDENTIALITY POLICY

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HR DEPARTMENT

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LEGALEASE SOLUTIONS LLC

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## **CONFIDENTIALITY POLICY: LEGALEASE SOLUTIONS PRIVATE LIMITED AND LEGALEASE SOLUTIONS, LLC**

This policy applies to all employees and contractors of LegalEase Solutions Private Limited and LegalEase Solutions, LLC.

### **1. AIMS & OBJECTIVES**

This policy document sets forth the policies and procedures used by LegalEase Solutions Private Limited and LegalEase Solutions, LLC (“LegalEase”) in executing its duty to keep business and client information safe and confidential while, at the same time, not compromising its ability to share information when needed in the exercise of its business. All personnel employed by LegalEase have a duty to keep such information strictly confidential and to use it only for purposes in accordance with this policy and the law. Except for information which is a matter of public record or disclosures required by law, LegalEase personnel shall not, during the term of their affiliation with LegalEase or afterwards, disclose any Confidential Information to any person or entity, except with the prior written consent of the President of LegalEase and any related client.

### **2. PURPOSE**

**2.1** The purpose of this Confidentiality Policy is to prescribe principles that must be observed by all LegalEase personnel and contractors who have access to confidential information.

**2.2** Effective policies and procedures for maintaining confidentiality are necessary for proper protection of confidential client and business information.

**2.3** This policy, where relevant, should be read in conjunction with the employee’s Employment Confirmation letter, Employment Agreement or Subcontractor Agreement.

### **3. DEFINITIONS**

#### **3.1 Confidential Information.**

Confidential Information includes information relating to clients of LegalEase and LegalEase internal operations specifically, all financial and accounting records, client and customer lists, other company data and information, all legal work products whether in final or draft form, and all information and communications (in any medium) entrusted to and/or passed on to LegalEase by its clients or passed on to clients by LegalEase, whether or not it be marked as confidential or proprietary. Confidential information may be received through formal channels (e.g. in a formal report), informally, or discovered by accident. It applies to information regarding LegalEase business, personnel, clients, clients’ clients or individuals or organizations that come into contact with the LegalEase

#### **3.2 Client Information.**

Client information includes work product information, and all communications (in any medium) received by LegalEase from its client in furtherance of a project, client database information and other identifying information including e-mail and business addresses, phone and fax numbers, and billing information.

#### **3.3 LegalEase Business or Sensitive Organizational Information.**

This includes all nonpublic information concerning LegalEase, its clients, vendors and suppliers, trade secrets, customer lists, company financial information and company personnel details.



### **3.4 LegalEase Personnel.**

This includes all full time, part time and contractual employees of LegalEase Solutions Private Limited and LegalEase Solutions, LLC whether or not on temporary leave.

### **3.5 Breach in Confidentiality.**

This refers to an instance where sensitive information is divulged to someone who is not authorized to access it and will result in consequences described in this policy. If LegalEase policies and procedures are appropriately followed, breaches will not occur.

## **4. PRINCIPLES**

**4.1** LegalEase is committed to maintaining the privacy of all its clients and personnel. It expects all personnel to handle all confidential information in a sensitive and professional manner.

**4.2** All personnel are obligated to access only information which they are authorized or required to access in the exercise of their employment with LegalEase.

**4.3** LegalEase recognizes the importance of an open culture with clear communication and accountability.

**4.4** LegalEase wishes to maintain personal and organizational safety and expects all personnel to handle sensitive information in a way which protects organizational security.

**4.5** Training in confidentiality will be required of all personnel, including managers and administrative personnel. Confidentiality will also be discussed at initial interviews and will be covered in all new hire training. .

**4.6** LegalEase recognizes that the best protection against breaches in confidentiality is to keep the number of personnel who have access to confidential information to a necessary minimum.

**4.7** Any unauthorized disclosure of confidential information by any personnel will result in disciplinary action and a notice to any related clients of the disclosure. Any disciplinary action will take account of the confidential and sensitive nature of the information disclosed, any damage done by the disclosure and will ensure that no further breaches of confidentiality take place.

## **5. MAINTENANCE OF CONFIDENTIALITY**

### **5.1 Employees have a duty:-**

- a) To treat all confidential information in the strictest confidence.
- b) To ensure that all information concerning client work product is used only for the purpose for which it was given to LegalEase.
- c) To discuss work matters only with other LegalEase employees who have a specific business reason to know or have access to such information.
- d) Not to disclosed information to anyone not directly concerned with that particular project except in the circumstances listed in this document under the section entitled "Disclosure of Information."
- e) To refrain from discussing work matters in public places.
- f) Not to leave any written confidential document where it can be read by others.



This includes telephone messages, computer prints, letter and other documents.

- g) Be aware of their personal responsibility and undertake to abide by the policies and procedures of LegalEase.
- h) Not access any work product for which they have no proper reason to in the course of their duties within LegalEase.
- i) Not access records for their personal interest.
- j) Recognize that they will be held liable for any misuse or negligent handling of confidential information.
- k) Be aware that failure to adhere to this could result in disciplinary action including dismissal from service.
- l) Be aware that it is obligatory on him/her to protect the security of LegalEase's and clients' and confidential information.

## **5.2 Manager/Team Leaders must:-**

- a) Destroy hard copies of documents containing confidential information that are not securely filed or archived.
- b) Oversee the monitoring and supervision of visitors to LegalEase offices to insure that they do not access confidential information.
- c) Ensure that all confidential information is secured physically or electronically at the end of every business day.
- d) Ensure the adequate destruction of all electronic and hard copies of confidential information once that information is no longer needed by LegalEase.

## **6. EMPLOYMENT REQUIREMENTS**

**6.1** All LegalEase personnel employment details must contain a statement enforcing the duty to abide by LegalEase's confidentiality policies. The LegalEase Employee Handbook must reiterate this obligation.

**6.2** Where contractors and employment agencies are used, the contracts between LegalEase and these third parties must contain clauses to ensure that contract personnel are bound by the same code of confidentiality as LegalEase personnel.

**6.3** LegalEase personnel, personnel of other agencies, and temporary personnel, must sign declarations of confidentiality on commencing employment with the LegalEase.

**6.4** Each manager/team leader must ensure that all personnel under their supervision are made aware of their responsibilities under this policy. Managers/team leaders are also responsible for directing personnel under their supervision should they have any request for or questions concerning confidential information. The manager/team leader should reiterate this at the yearly appraisal session.

## **7. DISCLOSURE OF INFORMATION TO OTHERS**

**7.1** Confidential information should not be divulged to anyone in or outside LegalEase who is not otherwise authorized to access the information, unless prior written consent is obtained from the LegalEase President and any concerned clients.

**7.2** Any unpermitted disclosure or failure to comply with this policy by any personnel will result in disciplinary action.



## **8. SAFEGUARDS TO KEEP INFORMATION CONFIDENTIAL**

**8.1.** Entry into LegalEase premises is strictly restricted by key or access card and it is obligatory for every personnel to carry their ID cards.

**8.2.** LegalEase personnel are not permitted to take any printed information containing confidential information outside of their designated work area.

**8.3** The usage of cameras, video, audio and data recording devices including camera phones and portable data storage devices are prohibited unless authorized by a Manager for a particular purpose.

**8.4** Password protection: Every computer and folder is password protected.

**8.5.** Data Integrity and Protection Component: All data is monitored and checked when relayed and when received from clients.

**8.6.** LegalEase routinely checks for viruses and exercises caution in sending and receiving attachments by e-mail.

**8.7.** A security personnel is deployed at entry and exit points of the office.

**8.8.** Restriction of shared information: personnel from one team cannot access data from another.

**8.9.** Personnel are not permitted to access personal e-mails from their respective work stations.

**8.10.** The LegalEase data is relayed predominantly via broadband and a secure server with all electronic entry points secured and all data movement logged.

**8.11.** A software firewall is implemented to provide string security policy for LAN and WAN.

**8.12.** Extensive background checks on all employees are completed before hire and periodically thereafter.

**8.13.** Every Associate is bound to enter into a confidentiality agreement.