
Global Confidentiality Policy Statement

Black & White Engineering is a consulting engineering business specialising in the data centre and mission critical market.

Black & White Engineering is committed to respecting privacy and implementing systems that support our duty of confidentiality and in all our business relationships, and this confidentiality policy explains how we expect our business to treat confidential information.

Our business will unavoidably receive and manage personal and confidential information concerning employees, projects, clients, partners, and our company. As such, we will strive to ensure that this information is well-protected.

Aims of this policy

The purpose of this Confidentiality Policy is to lay down the principles that must be observed by all who work with Black & White and have access to confidential information.

This policy, where relevant, should be read in conjunction with the appointment letter and / or employment contract applicable to Black & White employees, and other work rules, policies, and procedures applicable to Black & White employees.

Scope

This policy applies to all Black & White employees, contractors, sub-consultants, temporary employees & workplace students (all hereinafter referred to as employees).

Confidential workplace information within Black & White is generally broken down into three categories: employee personal information, management information and project information.

Employee Personal & Management Information: All personal data of all employees and business management information will be kept safe, secure, and up to date in accordance with all local law and legislation including the Data Protection Act 2018. Compliance with this act is Black & White's implementation of the General Data Protection Regulation (GDPR), which will be adhered to as a minimum in the absence of any regional requirement.

Project Information: All Black & White projects will, as a minimum follow signed industry standard forms of appointment which shall typically include straightforward obligations on both parties not to disclose confidential information. The nature of this 'confidential information', and how far the obligation extends, will vary between the different forms of contracts.

Standalone Non-Disclosure Agreements (NDAs)

Our clients may have specific concerns about confidentiality, driven by the nature of their business or the project, and therefore wish to have a stand-alone NDA to reinforce the obligations placed on Black & White, and in turn, our supply chain.

The B&W QSE technical operating procedures for 'appointment and project control' ensure that NDA requirements are considered with our clients on all projects (and maintained where applicable).

Our project NDA register is available to view by all staff and maintained by our Legal and Commercial Teams via our company SharePoint site.

Maintenance of Confidentiality and Non-Disclosure:

On all projects, Black & White project managers will establish the requirement for an NDA and implement where required. Once in place employees will:

- Lock or secure confidential information at all times.
- Use secure waste removal service.
- Confidential information is viewed on secure devices only.
- Only disclose information to other employees when necessary and authorised.
- Store confidential documents inside our Company premises (unless it's necessary to move them for project / security purposes)
- Encrypt electronic information and safeguard databases.
- Implement a senior management authorisation procedure to control employee access to certain confidential information.

Exceptions

All our project appointment and standalone NDAs shall clearly define what information is to be treated as confidential, and the uses and disclosure that can be made of it. The definition shall not be so wide as to hinder our ability to perform the services or restrict our ability to comply with our obligations under these agreements.

In all instance, Black & White confidentiality obligation agreement should not apply to the following information which shall be expressly excluded from our agreements, namely information that is;

- already in the public domain
- provided by third parties.
- already known to the consultant independently
- required to be disclosed by law.
- developed independently.
- disclosed other than as a result of any unlawful or unauthorised act or omission
- necessary in connection with entry into the appointment
- required for the proper performance of the services, or
- to be used in any legal proceedings

Breaching the duty of confidentiality

Black & White will investigate all potential breaches of this confidentially policy.

Any staff found to be in breach will face action in line with our company disciplinary procedures.

Where appropriate, employees may be subject to legal action in response to breaches, to mitigate damages to Black & White and our clients.



MICK CAIRNS, CEO,
Global Policy Leader

REVISIONS

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Date 19.01.2026

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Date 19.01.2026

Revision:

Revision No.	Date	Revision Details	Approved by
01	27.10.2021	Document reviewed and revision added	M Cairns
02	20.10.2022	Document reviewed revision history added	M Cairns/ J Middleton (HSEQ Smart)
03	13.12.2023	Document reviewed and new branding added	M Cairns/ J Middleton (HSEQ Smart)
04	21.01.2025	Document reviewed and new branding added	M Cairns/ J Middleton (HSEQ Smart)
05	19.01.2026	Annual Review. Addition of first paragraph. B&W abbreviation changed to Black & White.	M Cairns/ J Middleton (HSEQ Smart)