



Registered Office:  
Oshwal Centre  
Oshwal House  
Coopers Lane Road  
Northaw  
Herts  
EN6 4DG

**Hon. President: Runit Devchand Shah**  
**Hon. Treasurer: Meena Naren Shah**  
**Hon. Secretary: Avni Jayantilal Shah**  
**Hon. VP: Nirmal Chandrakant Shah**

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## Confidentiality Policy

### 1. Introduction

Oshwal Association of the UK ("OAUK") is committed to protecting the confidentiality, integrity, and security of all information entrusted to it. This Policy applies to all **staff, trustees, committee members, volunteers, contractors, and any individuals acting on behalf of OAUK.**

### 2. Purpose

The purpose of this Policy is to:

- Protect confidential and sensitive information belonging to OAUK, its members, donors, staff, volunteers, and partners
- Ensure compliance with the Data Protection Act 2018 and UK GDPR
- Reduce the risk of data breaches, misuse, or unauthorised disclosure
- Provide a clear framework for accountability and enforcement

### 3. Scope

This Policy applies to all information accessed, handled, or processed during the course of work or voluntary service for OAUK, regardless of format (paper, electronic, verbal, visual, or digital).

### 4. Definition of Confidential Information

Confidential Information includes, but is not limited to:

- Personal data of members, donors, staff, volunteers, beneficiaries, and service users
- Financial records, banking information, budgets, contracts, invoices, and payments
- Trustee, committee, and management papers, minutes, reports, and correspondence
- Legal advice, investigations, disputes, complaints, and regulatory matters
- Booking information, rate cards, agreements, and operational data
- IT systems, databases, login credentials, access codes, and security procedures
- Any information marked as confidential or which should reasonably be understood to be confidential





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## 5. Confidentiality Obligations

All covered individuals must:

- Access confidential information only where authorised and necessary for their role
- Use confidential information solely for legitimate OAUk purposes
- Keep all confidential information secure and protected from unauthorised access
- Not disclose confidential information to any unauthorised person, internally or externally
- Not remove, copy, photograph, store, or transmit confidential information except as authorised
- Follow all OAUk policies, including Data Protection, IT Acceptable Use, and Information Security policies
- Immediately report any actual or suspected data breach, loss, or unauthorised disclosure

## 6. Data Protection Responsibilities

Where confidential information includes personal data, individuals must:

- Process personal data only in accordance with OAUk instructions
- Comply fully with the Data Protection Act 2018 and UK GDPR
- Complete mandatory data protection and privacy training before accessing OAUk systems or data
- Respect confidentiality even after leaving OAUk

## 7. Exclusions

Confidential Information does not include information that:

- Is publicly available other than through a breach of this Policy
- Was lawfully known prior to involvement with OAUk
- Is lawfully disclosed by a third party without restriction
- Must be disclosed by law or a competent authority (subject to notification to OAUk where legally permitted)

## 8. Ownership of Information

All documents, data, records, and materials created, accessed, or used in connection with OAUk remain the property of OAUk.





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## 9. Return or Destruction of Information

On request, or when an individual's role with OAUUK ends, all confidential information (including copies, notes, and electronic files) must be returned or securely destroyed without delay.

## 10. Breach and Disciplinary Action

Failure to comply with this Policy may result in:

- Disciplinary action or removal from role
- Termination of employment, trusteeship, committee position, or volunteer role
- Referral to regulators or law enforcement where appropriate
- Legal action, including claims for damages

## 11. Governing Law

This Policy is governed by the laws of England and Wales.

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### **Nirmal C Shah**

CIO and DPO

**Oshwal Association of the UK (OAUUK)**

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OAUUK is a registered charity. We are committed to protecting your personal data in accordance with the UK GDPR and Data Protection Act 2018.

