Business Sensitive Information Policy

Document Governance

Function Owner	Department	Content Review Cycle	Date Last Revised
VP Risk Management & Compliance	Risk Management & Compliance	Annual	May 2024

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1. Policy Statement

CRDF Global generates, collects, manages, and stores information in the conduct of its business activities. Several categories of information deemed "business sensitive", described in Section 6 below, are critical to our business operations and to compliance with legal and contractual obligations, and thus subject to specific restrictions related to access, distribution, and storage. Our commitment to safeguard sensitive information extends to include sensitive information other organizations, partners, affiliates, and parties with whom CRDF Global conducts business may share with us.

All staff shall be aware of, and abide by, the guidelines set forth in this policy for the creation, distribution, and storage of "business sensitive" information.

Sensitive data shall be properly marked in accordance with this policy. Sensitive documents must be marked as "Proprietary" or "Confidential" or contain clear language identifying the data therein as sensitive. All proposals submitted by the organization to funders must include the following Confidentiality Statement materially consistent with the following:

> ***Confidentiality Statement:***
> *All information contained herein is considered confidential and proprietary. The information contained herein may not be reproduced, published, or distributed to, or for, any third parties without the express prior written consent of CRDF Global.*

Personnel must protect sensitive information including:

- Store sensitive data only in CRDF Global official business systems or, in the case of physical record, in a location with appropriate physical access controls.
- Do not store sensitive data on individual laptops, personal devices, or portable media (such a flash drives or other similar devices).
- Limit access to stored data to those with "Need to Know."
- Control access via appropriate controls– whether physical or electronic.

Disclosure to non-employees must be duly authorized by the Data Owner, and the receiving party must execute a Non-Disclosure Agreement prior to disclosure, unless disclosure is required by law or is required to comply with audit requirements.

- Share sensitive information only with authorized parties with a "Need to Know."
- Share the information in a secure manner (e.g. via encryption).

Sensitive data shall only be retained for the duration of the business purpose or as specified in the Record Retention policy unless required by law or court order. Personnel shall abide by CRDF Global's record retention policies and procedures for the proper retention or disposal of such information.

2. Purpose

The purpose of this policy is to establish guidelines for the identification, categorization, protection, and proper handling of business sensitive information owned or in the possession of CRDF Global. This policy aims to safeguard such information from unauthorized access, disclosure, alteration, disclosure, or destruction, thereby protecting the interests and confidentiality of the organization and its partners.

3. Definitions

Access Controls	Physical and electronic restrictions on access to sensitive information which limit such access only to those individuals(s)with formal access authority.
Authorized Party	An individual who has been delegated access or distribution rights for Business Sensitive data by the Data Owner. All such authorizations must be in written form and should be assigned on a need-to-know basis.
Business Sensitive Information	Data and information that required additional controls above and beyond the standard CRDF controls. These controls include Access, Storage, Transmission, Usage, and Disposal of such data and information.
Controlled Unclassified Information (CUI)	Information that requires protection in accordance with laws, regulations, or government policies but is not classified. CUI includes sensitive information that must be protected to safeguard national security and privacy,
Data Owners	CRDF Global employees responsible for the management, storage, access, and use of specified corporate data. Data Owners must authorize any information disclosure.
Need to Know	The need for an employee or other party to have access to specific business sensitive information for a demonstrated, legitimate business purpose. Information provided will be limited to only the information required by the partyto fulfil the specific business purpose.

4. Scope

This policy applies to all CRDF Global personnel and third parties to which CRDF Global provides access to CRDF Global information.

5. Exclusions

The following information is not covered by this policy:

Any information that…

(a) Was part of the public domain when received or becomes a part of the public domain through no action or lack of action by the Receiving Party.
(b) Prior to disclosure, was already in the Receiving Party's possession and not subject to an obligation of confidence imposed in another relationship.
(c) Subsequent to disclosure, is obtained from a third party who is lawfully in possession of the information and not subject to a contractual relationship to CRDF Global with respect to the information.
(d) Has been approved by Data Owner for public release.
(e) Is related to individual personal data. ***Personal data is governed by CRDF Global's Data Privacy Policy.***

6. Additional Content

CRDF Global's data is classified in the following categories:

Public

This information has been specifically approved for public release by the authorized Data Owner. Unauthorized disclosure of this information will not cause problems for CRDF Global, our customers, or our business partners. Examples are marketing brochures and material posted to the company web page. Disclosure of CRDF Global information to the public requires the existence of this label, the specific permission of the Data Owner, or long-standing practice of publicly distributing this information.

Internal Use Only

This information is intended for use within CRDF Global and in some cases within affiliated organizations, such as business partners. Unauthorized disclosure of this information to outsiders may be against laws and regulations, or may cause problems for CRDF Global, our customers, or our business partners. This type of information is already widely distributed within CRDF Global or it could be so distributed within the organization without advance permission from the Data Owner. Examples include internal organizational announcements and most internal electronic mail messages.

Confidential

This information is private or otherwise sensitive in nature and must be restricted to those with a legitimate business need for access. Unauthorized disclosure of this information to people without a business need for access may be against laws and regulations, or may cause significant problems for CRDF Global, our customers, or our business partners. Decisions about the provision of access to this information must be cleared through the Data Owner. Examples are cardholder data, customer transaction account information and performance evaluation records. All confidential information shall be subject to appropriate access controls.

Restricted

This information is the most private or otherwise sensitive and must be monitored and subject to appropriate access controls at all times. Unauthorized disclosure of this information to people without a business need for access may be against laws and regulations, or may cause severe problems for CRDF Global, our customers, or our business partners. Decisions about the provision of access to this information must be cleared through the Data Owner. Examples are strategic plans and legal information protected by attorney-client privilege. This information will be restricted solely to those with a need to know.

Default Category

If information is not marked with one of these four categories, it will default into the Internal Use Only category.

Special Handling

Certain CRDF Global information requires additional sensitivity markings and special handling in addition to the categorization of data.

Attorney Client Privileged

This category is data that is protected under the law as communication between a client and an attorney. Consult with legal counsel before labeling or transmitting any information that you believe may be Attorney Client Privileged. Never disclose to an outside party any data or communication received from a CRDF Globals attorney, unless the attorney has provided express permission for the disclosure.

Data Exchanged Pursuant to a Non-Disclosure Agreement (NDA)

Upon execution of an NDA (or Teaming Agreement), CRDF Global data may be exchanged provided that the tangible data is marked as "CRDF Global Proprietary". If any data is exchanged orally or visually, the CRDF Global employee transmitting the data must make known the proprietary nature of the data to the other party at the time of exchange, and promptly follow-up with a written communication memorializing the disclosure of CRDF Global Proprietary data. All tangible data

exchanged under the NDA should be retrieved (or the other party should be instructed to destroy the data) upon the conclusion of the business purpose for which the NDA was created.

Controlled Unclassified Information (CUI)

7. Related Documents

CRDF Global Policies, Processes, and Procedures

Related Policies	Related Processes	Related Procedures
Record Retention Policy		
Data Privacy Policy		
Business Development Policy		
Prime Agreement Management Policy		
Identify and Access Management Policy		
Evidence Preservation Policy		
Legal Services and Compliance Policy		
Procurement Policy		

External References

External Reference	Description