



CRCC Asia Confidentiality Guidelines

CRCC's Privacy Policy addresses how CRCC will handle Personally Identifiable Information (PII) or other sensitive personal information of a non-public nature (together "Confidential information") that you may disclose to us during the course of your CRCC Asia internship program. These Confidentiality Guidelines describe CRCC's general practices with respect to the sharing of Confidential Information, subject always to CRCC's Privacy Policy.

1. Circumstances in which you may share Confidential Information with CRCC during your CRCC Program

There are certain circumstances in which you may have to (or wish to) disclose Confidential Information to CRCC Asia staff or authorized contractors during your internship program. These include but are not limited to (a) health and safety emergencies, where CRCC may provide you with assistance, and (b) complaints and related investigation materials related to CRCC Asia's Non-Discrimination, Harassment and Bullying Policy.

2. How we address disclosures of Confidential Information during your CRCC Program

CRCC staff and authorized contractors will follow the guidelines set forth herein when managing disclosures of Confidential Information within CRCC and, where applicable, to third parties, during your CRCC Program.

a. CRCC Asia staff members or authorized contractors who receive Confidential Information in connection with a CRCC program participant health or safety emergency, a complaint of harassment or bullying, or other similarly sensitive matter, will evaluate the situation and attempt, in the first instance, to address the matter on their own without involving other CRCC Asia staff or contractors or further disclosing Confidential Information relating to the incident. Depending on their seniority, they may have to escalate the issue to more senior members of CRCC Asia staff or report the incident after it has been resolved. The applicable principle is to keep the disclosure of Confidential Information limited to those within the CRCC organization or its authorized contractors with a need to know in order to effectively resolve incidents or comply with applicable laws or contractual obligations. The CRCC Asia staff member will also have to record the incident in CRCC's internal incident database to ensure that CRCC meets its legal, contractual and other reporting requirements, but again the applicable principle is to limit the disclosure of Confidential Information to the amount of disclosure reasonably required to meet the reporting or other requirement.

b. In certain circumstances it may be necessary to share Confidential Information relating to a CRCC participant or an incident with a third party in order to deal effectively with the matter. For example, if you report an



instance of harassment in your host company, we may need to share the details with your host company in order to resolve the issue. We will normally obtain your written or verbal consent before doing so, although in certain circumstances (e.g. a medical emergency), this may not be possible. Similarly, in situations involving an immediate threat to the health or safety of you or another CRCC participant or staff member, disclosure of Confidential Information may be made to appropriate health professionals or law enforcement.

c. If you are a participant on a program with one of our university or government partners, we will need to share Confidential Information relating to program participants or incidents with our partner organization, but we will generally limit the disclosure of Confidential Information to that which is needed to ensure their awareness of the matter and CRCC's plan for addressing it. If a CRCC university or government partner requests full details of an incident, we will be required to disclose all relevant Confidential Information, but we will seek to inform you before doing so.

d. If you are not a participant on a program with one of our university or government partners, but your university or another third party such as a parent or guardian requests Confidential Information about you or any incident, we will not disclose Confidential Information without first obtaining your written or verbal consent.