

MEDICINE HAT & DISTRICT HEALTH FOUNDATION

Policy and Procedure Manual	Title: Confidentiality Policy	
	Section: Ethics and Accountability	Reference Number: III.2019.001

SCOPE

This policy affects all employees, including Board Members, investors, contractors and volunteers herein after referred to as “Foundation Representatives” who may have access to confidential information.

PURPOSE

The purpose of this confidentiality policy is to explain how the MEDICINE HAT & DISTRICT HEALTH FOUNDATION expects our Foundation Representatives to treat confidential information. Foundation Representatives will unavoidably receive and handle personal and private information about donors, Board Members, partners and our organization. We want to make sure that this information is well – protected.

We must protect this information for two reasons.

It may:

- Be legally binding
- Constitute the backbone of our business, giving us a competitive advantage

POLICY ELEMENTS

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Employees may have various levels of authorized access to confidential information.

WHAT SHOULD FOUNDATION REPRESENTATIVES DO?

- Lock or secure confidential information at all times.
- Shred confidential documents when they are no longer needed.
- Make sure they only view confidential information on secure devices.

MEDICINE HAT & DISTRICT HEALTH FOUNDATION

- Only disclose information to other Foundation Representatives when it is necessary and authorized.
- Keep confidential documents inside our company's premises unless it is absolutely necessary to move them.

WHAT SHOULD FOUNDATION REPRESENTATIVES NOT DO?

- Use confidential information for any personal benefit or profit.
- Disclose confidential information to anyone outside of our company.
- Replicate confidential documents and files and store them on insecure devices.

When Board Members leave their position with the Health Foundation, they are obligated to return any confidential files and delete them from their personal devices.

CONFIDENTIALITY MEASURES

We will take measures to ensure that confidential information is well protected.

We will:

- Store and secure paper documents.
- Encrypt electronic information and safeguard databases.
- Ask Representatives to sign non-disclosure agreements (NDA's).
- Ask for authorization by Executive Director to allow Representatives to access certain confidential information.

EXCEPTIONS

Confidential information may occasionally have to be disclosed for legitimate reasons.

Examples:

- If a regulatory body requests it as part of an investigation or audit.
- If our organization examines a venture or partnership that requires disclosing some information (within legal boundaries).

MEDICINE HAT & DISTRICT HEALTH FOUNDATION

In such cases, Representatives involved should document their disclosure procedure and collect all needed authorizations. We are bound to avoid disclosing more information than needed.

DISCIPLINARY CONSEQUENCES

Foundation Representatives who do not respect our confidentiality policy will face disciplinary and, possibly, legal action.

We will investigate every breach of this policy. We will terminate any Foundation Representative who willfully or regularly breaches our confidentiality guidelines for personal profit or who repeatedly disregard this policy, even when they do so unintentionally. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness.

This policy is binding even after separation with the Health Foundation Board of Directors.

At the end of a Board Member's term in office, he or she shall return, at the request of MEDICINE HAT & DISTRICT HEALTH FOUNDATION, all documents, papers, and other materials, regardless of medium, that may contain or be derived from confidential information in his or her possession.

Signatures/Approvals:

<u>Brent Fisher</u>	<u>Board Chair</u>	<u>September 2019</u>
Name	Title	Date

<u>Heather Bach</u>	<u>Executive Director</u>	<u>September 2019</u>
Name	Title	Date