



CONFIDENTIALITY POLICY

Definitions

1. The term "Confidential Information" includes, but is not limited to, the following:
 - a. Personal information including: address, email address, phone numbers, date of birth, financial information, medical history and Police Vulnerable Sector Checks.
 - b. The KW Sertoma Speed Skating Club's (KWSSSC) intellectual property, proprietary information, and business related to KWSSSC's programs, fundraisers, procedures, business methods, forms, policies, information gathered through discipline or harassment matters, marketing and development plans, advertising programs, creative and training materials, trade secrets, knowledge, techniques, data, products, technology, computer programs, manuals, registration lists, software, financial information, and information that is not generally or publicly known or distributed.
 - c. Confidential Information does not include name or any other information widely available or posted publicly.
 - d. Directors, Members and Volunteers voluntarily publishing or consenting to the publication of basic personal information in a public forum (such as the listing of an email address on a website) forfeit the expectation of confidentiality for that personal information for as long as it is available publicly.

Purpose

2. The purpose of this policy is to ensure that all Directors, Committee Members and Volunteers of KWSSSC protect confidential information.

Duty of Each Director, Committee Member and Volunteer

3. As a Director, Committee Member or other Volunteer with ongoing regular responsibilities with the KWSSSC, individuals may become aware of, or have access to, certain confidential information.
4. All Confidential Information acquired or handled by Volunteers shall be collected, used, stored, transported, transmitted and (as appropriate) destroyed in a manner that is appropriately confidential and secure given the nature of the information and the related circumstances.
5. It is the responsibility of the Director, Committee Member and Volunteer to know what information is confidential and to obtain clarification when in doubt.
6. Except as may be compelled by applicable legal process, a Director, Committee Member or Volunteer must, both while having and after ceasing to have that status, treat as confidential all information regarding the policies, internal operations, systems, business or affairs of the

Corporation obtained by reason of her/his status as a Director, Committee Member or Volunteer and not generally available to the public.

7. A Director or Committee Member shall not use information obtained as a result of his/her involvement on the Board or on a committee for her/his personal benefit. Each Director and Committee Member shall avoid activities which may create appearances that she/he has benefited from confidential information received during the course of his/her duties as a Director or Committee Member.
8. All such information is strictly confidential and shall not be discussed with any other person except as completely necessary in the performance of one's responsibilities or where required by law.
9. Directors, Committee Members and Volunteers will not carelessly, recklessly or willfully handle, manage or otherwise compromise the confidentiality of any confidential information. However, where the awareness of confidential information requires acting upon, individuals will relay that information to the Board President and/or Club Coach in confidence.
10. This policy complements KWSSSC's Privacy Policy, ensuring all information is handled according to relevant legislation.
11. Each Director, upon being elected or appointed, shall review this Policy and such other policies of KWSSSC that apply to Directors.

Communications

12. This policy must be effectively communicated to those who will be responsible for upholding the policy, as well as to those who will be responsible for its implementation.

Review

13. This policy will be reviewed annually, or as decided, by the KWSSSC Board of Directors.

Approval

14. This policy was approved by the KWSSSC Board of Directors on January 8, 2019.