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| Confidentiality Policy | Policy Number: PA-109 |
| Last Reviewed: 2019/09/01 | Next Review: 2020/09/01 |

Purpose: The Pinnguaq Association values the protection and appropriate treatment of confidential information in accordance with legal obligations and the best interests of the organization, its beneficiaries or clients.

Policy Statement: Pinnguaq is entrusted with information that is of a confidential nature. To be in compliance with privacy legislation, it is crucial that our organization maintains confidentiality and limit disclosure of such information. The right to maintain all confidential information constitutes a proprietary right which Pinnguaq is entitled to protect.

Scope: This policy applies to all employees, volunteers, delegates, students, and third party service providers of Pinnguaq Association.

1. **Definition:**

- 1.1. **Confidential Information:** refers to information that, if disclosed without authorization, could be prejudicial to the interests of Pinnguaq and/or individual(s) in or associated with the organization. Confidential information includes but is not limited to the following:
 - 1.1.1. Any document which identifies a donor or a client by name.
 - 1.1.2. Any document which contains personal delegate, employee, or volunteer information beyond the name, title, business address, business email and business phone number(s).
 - 1.1.3. In-camera (limited attendance by senior management and advisors who customarily attend meetings) minutes, or other minutes marked 'Confidential', resulting from Board meetings and/or their committees.
 - 1.1.4. Incoming and outgoing emails, hard-copy mail, and faxed document marked 'Private' or 'Confidential', including copies.
 - 1.1.5. Documents that contain trade secrets or proprietary information such that the sharing of said documents may assist a competitor(s).

- 1.1.6. Any other document marked confidential by the sender. The sender will use discretion to identify what should be designated confidential in addition to the documents listed

2. **Procedures:**

2.1. Handling of Confidential Information:

- 2.1.1. All such information that The Pinnguaq Association employees receive in the course of employment, including information received from co-workers, grant applicants, board members, and board committees, is to be held by the employees in the strictest of confidence, unless a matter of public record or specified otherwise by the Executive Director.
- 2.1.2. All employee and volunteer medical information will remain confidential except by written release or where the release is required by law. However, some types of insurance require the delegate, employee or volunteer to release information to insurer(s) in order to validate claims or eligibility.
- 2.1.3. Upon termination of employment, an employee may not remove any confidential information from The Pinnguaq Association offices and must return any confidential information in his/her possession.
- 2.1.4. All records containing confidential information created or received by individuals must be protected against unauthorized access, collection, use, disclosure, retention or disposal through the use of reasonable security measures and effective records management.
- 2.1.5. Employee computers should be password protected to prevent unauthorized access.
- 2.1.6. Confidential information regarding employees, or clients must be held in a locked filing cabinet.

3. **Breach of Confidentiality**

- 3.1. All individuals must comply with the following standards. Failure to do so will be considered a breach of confidentiality:
- 3.2. Individuals must not place themselves in a position of obligation to persons who might benefit or appear to benefit from disclosure of confidential information.
- 3.3. Individuals must not benefit or appear to benefit from the use of information not generally available to the public and which was acquired during the course of their official Society duties.

- 3.4. Individuals must consult with their supervisor when they are requested to provide any information which may breach the confidentiality standards defined in this policy.
 - 3.5. Individuals who receive unsolicited information, misdirected mail, or who have access to confidential information without authorization must notify their supervisor immediately.
 - 3.6. Any person working for/engaged with Pinnguaq, who for any reason, deliberately accesses or misuses confidential information not required in the performance of their duties is in breach of confidentiality, whether or not the information is disclosed to another person(s).
 - 3.7. Individuals who fail to comply with this policy during the course of their employment, engagement, or contract with the Society or following the conclusion of their services, will be subject to disciplinary action, up to and including termination of employment, engagement, or contract with the organization, and/or legal action, as applicable.
4. **Remote Workers:**
- 4.1. Employees working from remote locations must adhere to this policy.
 - 4.2. Remote employees must secure their working space to protect documents, information and property.
 - 4.3. The department and the employee will minimize the risk of working with sensitive information away from the office.