



Building Healthy Minds and Bodies since 1977

4.34 CONFIDENTIALITY POLICY

PURPOSE

All employees of Okanagan Gymnastics Centre (OGC) have a legal and ethical responsibility to protect the confidential information of OGC athletes, customers, volunteers, employees, members, and stakeholders.

POLICY

During the course of everyday business, OGC employees will unavoidably receive and handle personal and private information about athletes, customers, volunteers, members, and stakeholders. Employees shall not disclose nor discuss any information acquired during the course of their work except to authorized personnel.

This policy affects all employees and others that may have access to confidential information related to OGC users, including but not limited to board members, contractors and volunteers.

PROCEDURE

Information that employees may have access to and OGC considers confidential includes but is not limited to:

- Class lists (past and present)
- Data and information of customers and athletes
- Unpublished financial information
- Unpublished goals, forecasts or initiatives that are marked as confidential
- Data and information entrusted to OGC by external parties
- Documents, processes or other elements explicitly marked as confidential
- Any other knowledge acquired by employees during their employment

In the course of employment, employees may have various levels of authorized access to confidential information so as to conduct business. When they do, the following rules strictly apply:

- No amount of information will be shared to anyone outside of the organization, without written approval from the Director of Operations

- The disclosure of information inside the organization will be limited to those with authorized access and legitimate reason to require that information
- The information will not be used for the personal benefit or profit of the employee or any other except OGC
- The employee will have access only to the amount and type of information required for the completion of their job responsibilities and no more
- Employees must limit to a minimum the occasions when they take confidential information out of the office
- When reviewing or sharing information through electronic means, all precautionary safety measures must be in effect
- Confidential information must not be left unattended or unlocked either at OGC premises or in the care/control of an individual off OGC premises
- Unauthorized copying of information is not allowed
- All copies of confidential documents must be shredded when no longer needed
- Upon separation of employment all confidential information must be returned or deleted from the employee's electronic devices

Measures will be taken to ensure that confidential information of OGC is well protected. Those measures include but are not limited to:

- Electronic information will be encrypted
- Databases will be protected with all available security measures
- Important paper documents will be safely stored and locked
- Authorization of access will be carefully controlled by management

Confidential information as described above may occasionally have to be disclosed for legitimate reasons, ie. Upon request of a regulatory body, or government officials (RCMP, child protection, etc). In such cases, a strict procedure must be followed that includes the explicit consent of parties involved (unless they are faced with criminal investigation) and the disclosure of only relevant information and no more.

Disciplinary Consequences:

OGC places great importance in this policy. Any failure or refusal will bring about disciplinary and, possible, legal action. OGC is prepared to terminate any employee who willfully or regularly breaches the confidentiality guidelines for personal profit. Serious offences such as theft of information, illegal disclosure of sensitive data etc. will be grounds for immediate for-cause dismissal and may also involve legal consequences.

Any unintentional breach of this policy will be thoroughly investigated and will be punished appropriately depending on its magnitude and seriousness.

This policy is binding even after separation of employment.

APPROVED BY OGC BOARD OF DIRECTORS OCTOBER 19, 2016