

Confidentiality Policy – KPS & KPR

This document outlines the fundamental objectives setting forth the confidentiality policies for Plast USO (“Plast”). It is not the intent of this policy to circumvent state or federal law; state and federal law take precedence over any statement made in this policy.

Scope of this Policy

The purpose of this confidentiality policy is to ensure that the highest ethical standards and integrity are maintained in conducting the business of Plast and carrying out its mission. All members of the National Board of Directors (including their staff “Bulava”) and the Plast National Council are subject to this confidentiality policy and shall exercise good faith and judgment in all dealings relating to his or her position with Plast. Disclosures by these individuals inconsistent with this policy shall not be permitted unless expressly approved by the Plast Chief Corporate Officer.

Definitions

National Board of Directors (Directors) – shall refer to the Plast National Board of Directors, the governing body established by the Plast Bylaws.

Chair – shall refer to Chair / Chief Corporate Officer of Plast USO.

Confidential Information – shall refer to information, in any form or medium (e.g., verbal, written or electronic), including notes, copies and summaries, maintained, received, created or requested by Plast or any of the members of the National Board of Directors (or “Bulava”) that identifies, or can be used to identify, any individual. It also relates to business meetings or portion thereof, where there is discussion of sensitive topics regarding past, present or future actions and activities as well as financial, legal, human resources or strategy, or other matters that may hinder Directors, Employees or Volunteers to operate effectively and work business topics. Examples of Confidential Information include (not an exhaustive list):

- Member and Camper records
- Computerized member and camper data
- Medical records or information of campers and members or their family members
- Detailed donor demographics (including but not limited to names, addresses, amounts donated, etc.)
- Internal financial reports
- Any human resource information about Directors, employees or volunteers
- Contracts with vendors
- Disciplinary records and notes (including, but not limited to names, discussion notes, summaries of parental calls as well as incident reports).
- Employee files
- Legal agreements and settlements
- Any verbal information provided in reference to the above

General Information

Directors may not disclose, divulge or make accessible Confidential Information belonging to, or obtained through, their affiliation with the organization to any person, including relatives, friends and

business and professional associates, members of the media, other than to persons who have a legitimate need for such information and to whom the organization has authorized disclosure. The Directors, as fiduciaries, can use their judgment when determining legitimate need and this is subject to review by the Chair who shall have authority to refuse or revoke disclosure. Directors shall use Confidential Information solely for the purpose of performing services as a Board member for the organization. This is not intended to prevent disclosure where disclosure is required by law.

Directors must exercise good judgment and care at all times in order to avoid unauthorized or improper disclosures of Confidential Information. Conversations in public places should be limited to matters that do not pertain to information of a sensitive or confidential nature. In addition, Directors, employees and volunteers should be sensitive to the risk of inadvertent disclosure and should, for example, refrain from leaving Confidential Information on desks or otherwise in plain view and refrain from the use of speakerphones to discuss Confidential Information if the conversation could be heard by unauthorized persons. Adherence to this policy extends beyond the service on the National Board of Directors as long as the information remains confidential.

Procedure

- Directors (including their “Bulava”) and National Council members will be expected to read and sign the Plast USO Confidentiality Policy Certification at the beginning of each of their terms on the Board prior to gaining access to Confidential Information.
 - The Chair – will manage and retain these signed documents. For the National Board of Directors: Chief Corporate Officer or his/her designee
 - The Leader of the National Council shall manage and retain these signed documents on behalf of the National Council.
 - This can be delegated; however accountability is with the Chair as listed above.
 - The Chief Corporate Officer shall receive a copy of each signed confidentiality agreement from each Director.

Enforcement

- In the event an individual fails to submit a completed Agreement as required by this policy, that individual shall be advised that he or she is not in compliance with the Confidentiality Policy.
- If a Director (or member of a “Bulava”) fails to accept and sign the Agreement prior to his or her first Board or committee meeting after election, he or she will be advised by the Chair/Chief Corporate Officer that his or her participation in official National Board of Directors activities is suspended until compliance with this policy is completed in a manner satisfactory to the Chair/Chief Corporate Officer.
- If a member of the National Council fails to accept and sign the Agreement prior to his or her first meeting after election, he or she will be advised by the Chair of the National Council that his or her participation in official National Council activities is suspended until compliance with this policy is completed in a manner satisfactory to the Chair/Chief Corporate Officer.

Determination of Whether a Breach of Confidentiality Exists

- If the Chair has reasonable cause to believe that a breach of confidentiality exists, the Chair shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged breach.
- If, after hearing the response of the individual and making such further investigation as may be warranted in the circumstances, the Chair determines that the individual has in fact breached confidentiality, appropriate disciplinary and corrective action shall be taken according to the current policies and procedures of the organization.

Termination

- At the end of a Director’s term in office (or termination of a “Bulava” member), when a volunteer leaves or upon the termination of an employee’s employment, he or she shall return all documents, papers and other materials, regardless of medium, that may contain or be derived from Confidential Information in his or her possession. All keys, key cards, credit cards and identification cards will be returned, and the individual’s access to electronic information will be terminated.
- Because Plast has a “bring your own technology policy” and as a result, all confidential information must be removed from personal electronic devices within four weeks of the end of the individual’s term . When the removal of confidential information from an individual's personal computing device, the individual must confirm this has been done and is completed via email to the Chair.

Approved by the Plast National Board of Directors on this 10th day of June, 2024

Plast Confidentiality Policy Certification

I have been given the opportunity to review the Plast USO Confidentiality Policy and understand how this applies to me. I have had the opportunity to ask questions regarding the policy and agree to abide by the policy.

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| Name Printed | Signature | Date |
| <input type="checkbox"/> Radar (Check one) | <input type="checkbox"/> Director | <input type="checkbox"/> Bulava |