



# CONFIDENTIALITY POLICY

## 1.0 Definitions

1.1 The following terms have these meanings in this Policy:

1.1.1 "Board" means the Board of Directors of the OSC;

1.1.2 "By-Laws" means By-Laws of OSC as amended from time to time;

1.1.3 "Employees" means individuals employed directly by OSC and paid a salary or wage to provide coaching or support services to the operations of OSC. Employees include but are not limited to coaches, executive general managers, accountants, bookkeepers, administrative assistants, and receptionists;

1.1.4 "Member" means a Member of the OSC within the meaning of the OSC's Bylaws;

1.1.5 "OSC" means the Olympian Swim Club;

1.1.6 "Volunteers" means individuals who provide a service other than coaching, including but not limited to officiating, chaperoning, or social event organization

## 2.0 Purpose

2.1 The purpose of this Policy is to ensure the protection of Confidential Information that is proprietary to OSC.

## 3.0 Application of this Policy

3.1 This Policy applies to all Employees, Board Members, Members, and Volunteers.

## 4.0 Confidential Information

4.1 The term "Confidential Information" includes but is not limited to the following:

- 4.1.1 Personal information of Members, Employees and Volunteers including:
- Home address
  - Email address
  - Telephone numbers
  - Date of Birth
  - Financial information

- Medical information
- Criminal record checks and vulnerable sector checks

1.1.2 OSC intellectual property, proprietary information, and business related to OSC's programs, fundraisers, procedures, business methods, forms, policies, marketing and development plans, advertising programs, creating 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 publically known or distributed.

1.1.3 "In Camera" discussions at Board Meetings, draft policies, internal memorandums and reports prepared for Board use, draft Board minutes, emails between Board members in relation to matters concerning OSC, Board discussions other than what is reflected in the Board minutes.

- 1.2 The term "Confidential Information" does not include the following:
- Swimmer or member names
  - Member email addresses and telephone numbers unless that Member has specifically requested in writing that their email address and telephone number not be included in the OSC Member's Directory
  - Photographs, video recordings, or voice recordings of Members, swimmers, employees, or volunteers produced while that person is participating in officially sanctioned OSC activities such as swim practices, swim meets and club social events

## 2.0 Responsibilities

- 2.1 Employees, Members, Board members, and Volunteers will not:
- 2.1.1 Either during the period of their involvement or employment with OSC or any time thereafter, disclose to any person or organization any Confidential Information acquired during their period of involvement or employment, unless expressly authorized to do so;
- 2.1.2 Publish, communicate, divulge, or disclose to any unauthorized person, business, organization or third party any Confidential Information without the express written consent of OSC;
- 2.1.3 Use, reproduce, or distribute Confidential Information without the express written consent of OSC.
- 2.2 All files, electronic records, and written materials relating to Confidential Information shall remain the property of OSC and upon the termination of involvement or employment with OSC and shall be returned to OSC, along with all copies and reproductions, immediately upon request.

## 3.0 Intellectual Property

- 3.1 Copyright and other intellectual property rights for all written material (including material in electronic format or posted on the OSC website) and other works produced in connection with employment or involvement with OSC will be owned solely by OSC, which shall have the right to use, reproduce, or distribute such

material or works, in whole or in part, for any purpose it wishes. OSC may grant permission for others to use its intellectual property.

## **4.0 Enforcement**

- 4.1** A breach of any provision of this Policy shall be deemed to be a major infraction under the OSC Code of Conduct & Ethics, Discipline & Complaints and Appeal Policy and shall be dealt with in accordance with that Policy.