

## **Confidentiality Policy**

"Organization" refers to: Swim Natation Manitoba

### **Terms and Definitions**

1. Terms in this Policy are defined as follows:
  - a. "*Athlete*" – An individual who is an Athlete Participant in the Organization
  - b. "*Confidential Information*" – Personal information of Participants including but not limited to home address, email address, personal phone numbers, date of birth, financial information, medical information, child abuse registry checks, and background check information. Additionally, *Confidential Information* also includes information considered to be intellectual property of the Organization such as data, proprietary information, business information, and trade secrets.
  - c. "*Participants*" – Refers to all categories of individual members and/or registrants defined in the By-laws of the Organization who are subject to the policies of the Organization, as well as all people employed by, contracted by, or engaged in activities with the Organization including, but not limited to, employees, contractors, Athletes, coaches, instructors, officials, volunteers, managers, administrators, committee members, parents or guardians, spectators, and Directors and Officers
  - d. "*Representative*" – All individuals employed by, or engaged in activities on behalf of, the Organization. Representatives include, but are not limited to, staff, administrators, Directors and Officers of the Organization, committee members, and volunteers.

### **Purpose**

1. The purpose of this Policy is to ensure the protection of Confidential Information that is proprietary to the Organization.

### **Scope and Application**

1. This policy applies to all Representatives of the Organization.
2. Confidential Information does not include the following: name, title, business address, work telephone number, or any other information widely available or in the public domain.
3. Participants voluntarily publishing or consenting to the publication of their personal information in a public forum (such as the listing of an email address on a website) forfeit the expectation of confidentiality for that information for as long as it is available publicly.

### **Responsibilities**

1. Representatives will not, either during the period of their involvement/employment with the Organization or any time thereafter, disclose, publish, communicate, or divulge to any person or organization any Confidential Information acquired during their period of involvement/employment, unless expressly authorized to do so.
2. Representatives will not use, reproduce, or distribute Confidential Information without the express written consent of the Organization.
3. All documents and written materials relating to Confidential Information will remain the property of the Organization and, upon cessation of involvement/employment with the Organization, for any reason, or upon request of the Organization, Representatives will





immediately return all written or tangible Confidential Information, as well as copies and reproductions, and any other media containing Confidential Information.

**Intellectual Property**

1. Copyright and any other intellectual property rights for all written material (including material in electronic format or posted on a website) and other works produced in connection with employment or involvement with the Organization will be owned solely by the Organization, which shall have the right to use, reproduce, or distribute such material and works, in whole or in part, for any purpose it wishes. The Organization may grant permission for others to use its intellectual property.

**Enforcement**

1. A breach of any provision in this Policy may be subject to legal recourse, termination of the employment or volunteer position, suspension or expulsion from membership, or sanctions following a complaint filed pursuant to the *Discipline and Complaints Policy*.

<b>PSO Board of Directors Approval Date:</b>	19 September 2023
This Policy is subject to review at least once every three years by Governance Committee.	
<b>Date of last review: September 2023</b>	
<i>The publication of Swim Natation Manitoba policies will be in English.</i>	
<i>In the case of conflicting policies, the most recently dated board approved copy will prevail.</i>	
Relevant documents noted within this policy: <b>Discipline and Complaints Policy</b>	

