



**Date of Approval:**  
August 31, 2021

**Next Review:**  
August, 2023

**Approved by:**  
WGB Board of Directors

# CONFIDENTIALITY POLICY

**“Organization” refers to: Whitehorse Glacier Bears Swim Club (WGB)**

## 1. PURPOSE

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

## 2. APPLICATION OF THIS POLICY

This Policy applies to all categories of membership defined in the Organization’s Bylaws as well as all individuals employed by, or engaged in activities with, the Organization. Persons affected by this Policy include, but are not limited to, athletes, coaches, convenors, referees, officials, volunteers, managers, administrators, committee members, and Directors and Officers of the Organization (hereinafter “Representatives”).

## 3. CONFIDENTIAL INFORMATION

The term “Confidential Information” includes, but is not limited to, the following:

- A. Personal information of Organization Representatives including:
  - i. Home address
  - ii. Email address
  - iii. Personal phone numbers
  - iv. Date of birth
  - v. Financial information
  - vi. Medical history
  - vii. Criminal Record Checks
- B. Organization intellectual property, proprietary information, and business related to the Organization’s programs, fundraisers, procedures, business methods, forms, policies, marketing and development plans, advertising programs, creative 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 publicly known or distributed.
- C. Confidential Information does not include the following: name, title, business address, work telephone number, or any other information widely available or posted publicly.
- D. Representatives voluntarily publishing or consenting to the publication of basic personal information in a public forum (such as the listing of an email address on a website) forfeit the expectation of confidentiality for that personal information for as long as it is available publicly.

## 4. RESPONSIBILITIES

- A. Representatives will not, either during the period of their involvement/employment with the Organization or any time thereafter, disclose to any person or organization any Confidential Information acquired during their period of involvement/employment, unless expressly authorized to do so.
- B. Representatives will not publish, communicate, divulge, or disclose to any unauthorized person, firm, corporation, or third party any Confidential Information without the express written consent of the Organization.
- C. Representatives will not use, reproduce, or distribute Confidential Information without the express written consent of the Organization.
- D. All files and written materials relating to Confidential Information will remain the property of the Organization and, upon termination of involvement/employment with the Organization 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.

## 5. INTELLECTUAL PROPERTY

- A. 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.

## 6. ENFORCEMENT

- A. A breach of any provision in this Policy may be subject to legal recourse, termination of the employment or volunteer position, or sanctions pursuant to the Organization’s *Discipline and Complaints Policy*.