



Confidentiality Policy

1. Policy Statement

1.1 Canoe Kayak Ontario (CKO) including all of its affiliates, is committed to the values of ethical conduct, integrity, honesty and respect for others. CKO, and the many individuals involved in activities of the CKO, has access to both personal and confidential information. The protection of this information is essential for legal, ethical and business reasons.

2. Purpose

2.1 The purpose of this policy is to clarify the responsibilities of CKO, and of individuals involved in activities of CKO and its affiliates, in managing confidential information.

3. Application

3.1 This policy applies to all persons engaged in activities with or employed by CKO and its affiliates, including, directors, officers, committee members, volunteers and employees (including contract personnel) who have access to Confidential Information, as defined in Section 4.

3.2 This policy is in addition to the Privacy Policy, which governs the collection, use and disclosure of personal information in a manner that complies with the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

4. Definition of Confidential Information

4.1 In this policy, "Confidential Information" includes, but it not limited to,

- a) Personal information as defined in the Privacy Policy, including names, home addresses, e-mails, telephone numbers, date of birth, health and medical information;
- b) Human resources matters including contracts of employment, salaries and performance appraisals of employees of CKO;
- c) Legal matters including business contracts; and
- d) Intellectual property related to the business or affairs of CKO, including data, printed materials, technology, computer programs, manuals, business plans, marketing plans and financial information.
- e) Any information designated as confidential by the Board or Executive Director of CKO

5. Responsibilities of Individuals

5.1 Employees and contract personnel will respect the confidentiality provisions of their respective contracts of employment or services.

5.2 Persons involved with CKO, whether as a director, officer, committee member or other volunteer will not, either during the period of their involvement or any time thereafter, publish, communicate, divulge, disclose, use, reproduce or distribute to any

person or organization any Confidential Information about the business, affairs or personnel of CKO, unless expressly authorized to do so.

5.3 All files and written materials relating to the business, affairs or personnel of CKO will remain the property of CKO and upon request of CKO, the employee, contractor or individual involved with CKO will return all Confidential Information received in written or tangible form, including copies, or reproductions or other media containing such Confidential Information.

5.4 Members of the Board of Directors of CKO have unique responsibilities to maintain the confidentiality of Board business, to communicate to the public only those matters that the Board has agreed may be communicated and to do so in the manner prescribed by the Board, and to publicly support the positions taken and decisions made by the Board.

6. Responsibilities of CKO

6.1 CKO will not divulge to outside parties any personal information about an employee or contract personnel, including but not limited to place of residence, home phone number, date of hire, or earnings, without the employee or contract personnel's permission, unless required to do so by law.

6.2 Likewise, CKO will not divulge to outside parties any personal information about a director, officer, committee member or volunteer, unless expressly authorized to do so, permitted to do so in accordance with approved policies of CKO, or required to do so by law.

6.3 CKO will respect the confidentiality of medical information supplied by any athlete to CKO by not supplying this information to outside parties without the express consent of the athlete, unless required to do so by law or in accordance with the *Canadian Anti-Doping Program* or CKO's anti-doping policies.

7. Ownership of Intellectual Property

7.1 Copyright and any other intellectual property rights in all written material (including material in electronic format) and other works produced in connection with employment or volunteer involvement with CKO will be owned solely by CKO, who will have the right to use, reproduce or distribute such material and works, or any part thereof, for any purpose it wishes. CKO may grant permission for others to use such written material or other works, subject to such terms and conditions as CKO may prescribe.

8. Enforcement

8.1 Failure to adhere to this policy may give rise to discipline, as determined by the appropriate persons in a position of authority (Executive Director, President of CKO, Chair of a Discipline Committee).