

Policy Name: Confidentiality				<b>Date of Approval:</b> Nov 4, 2023			Effective Date: Nov 4, 2023
Approved by: Board of Directors		Prepared by: Risk & Safety Committee		ee	Replaces Previous Versions: March 17, 2018		
Review Cycle: Biennial							
Responsible: Board of Directors-Risk & Safety	Accountable: Board of Directors		Consulted: Board of Directors				ormed: O Members

#### **Preamble**

Hockey Northwestern Ontario is committed to protecting its proprietary confidential information.

### **Definitions**

HNO Representatives: all individuals employed by, or engaged in activities with HNO including, but not limited to, players, coaches, officials, volunteers, administrators, contract personnel, committee members, and board and committee members of HNO (hereinafter "HNO Representatives").

### **Confidential Information**

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

- a) Personal information of HNO Representatives including:
  - i. Home address
  - ii. Email address
  - iii. Personal phone numbers
  - iv. Date of birth
  - v. Financial information
  - vi. Medical history
  - vii. Police Vulnerable Sector Checks
- b) HNO intellectual property, proprietary information, and business related to HNO 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.

#### Purpose

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

# **Policy**

- 1. This Policy applies to HNO's membership and registered participants, within the Bylaws as well as all individuals employed by or engaged in activities with HNO. Persons affected by this Policy include, but are not limited to, players, coaches, officials, volunteers, administrators, contract personnel, committee members, and board/committee members of HNO (hereinafter "HNO Representatives").
- 2. Confidential Information does not include the following: name, title, business address, work telephone number, or any other information widely available or posted publicly.
- 3. HNO 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.

# Responsibilities

- 4. Representatives will not, either during the period of their involvement/employment with HNO 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.
- 5. HNO 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 HNO.
- 6. HNO Representatives will not use, reproduce, or distribute Confidential Information without the express written consent of HNO.
- 7. All files and written materials relating to Confidential Information will remain the property of HNO and, upon termination of involvement/employment with HNO or upon request of HNO, the HNO Representative will immediately return all written or tangible Confidential Information, as well as copies and reproductions, and any other media containing Confidential Information.

#### **Intellectual Property**

8. 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 HNO will be owned solely by HNO, which shall have the right to use, reproduce, or distribute such material and works, in whole or in part, for any purpose it wishes. HNO may grant permission for others to use its intellectual property.

#### **Enforcement**

9. 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 HNO's Discipline Policy.