

# **Confidentiality Policy**

## **Policy Administration**

Upper Canada Skating Club ("UCSC") maintains and reviews this Policy every three years.

Implementation Date	July 1, 2022
Updated to align with Skate Ontario SR-12 Confidentiality	June 16, 2024
Next Board Review	June 2028

## **Policy Statement**

The purpose of this Confidentiality Policy ("Policy") is to ensure that confidential information, as defined below, is disclosed only to individuals who are authorized to receive it. This Policy supports UCSC's Privacy Policy and ensures that all information is handled in accordance with applicable legislation.

## Scope/Applicability

This Policy applies to all UCSC Stakeholders, as defined below. The obligation to protect Confidential Information continues even after a Stakeholder's engagement with UCSC has ended.

#### **Definitions**

**Confidential Information** – Any confidential or proprietary information relating to UCSC's past, current, or future operations that is not publicly available or a matter of public record. This includes, but is not limited to, the following types of information, in any form:

- Organizational information such as contractual arrangements, business and marketing strategies, research data, plans, methods, procedures, intellectual property (e.g., patents, trademarks), and other business-related materials not generally known or used as standard practice.
- Summaries, reports, drafts, or working documents that contain Confidential Information.
- Internal communications and records related to UCSC operations, including audits and asset details.
- Details of pending or potential legal actions or negotiations.
- Information or agreements involving vendors, suppliers, and other external parties.
- Information and agreements involving UCSC members or participants in ICSC programs, including personal information as described in the UCSC Privacy Policy.
- Financial data, including budgets, forecasts, cost analysis, performance data, investments, debt arrangements, and funding sources.



- Personnel data, including staff lists, résumés, payroll, organizational structure, and performance evaluations.
- Any other information that UCSC considers confidential, whether it is explicitly marked as such.

Additionally, any matters discussed during in camera sessions of meetings must remain confidential until officially disclosed in an open meeting. Committee-related matters are also considered confidential unless explicitly designated otherwise by the Committee Chair, in consultation with the UCSC Chair and/or Executive Director. This Policy provides guidance for making such determinations.

**Stakeholders** – This term includes skaters, coaches, officials, team managers, contractors, staff, directors, committee members, volunteers, and participants.

#### **Use of Confidential Information**

Stakeholders may be granted access to Confidential Information solely for the purpose of fulfilling their designated roles and responsibilities. Any other use is strictly prohibited.

Confidential Information must not be disclosed unless:

- It is necessary for the performance of authorized duties,
- Required by law, or
- Approved in writing by the UCSC Executive Director.

All Confidential Information remains the exclusive property of UCSC. Any materials, documents, or records containing such information must be returned to UCSC upon the termination of a Stakeholder's involvement with the organization.

In certain cases, UCSC may be legally required to disclose Confidential Information due to applicable laws or the order of a court or tribunal with appropriate jurisdiction, even if consent has not been granted.

The use of Confidential Information for personal benefit or speculative purposes is strictly prohibited.

Unauthorized use or disclosure of Confidential Information may result in serious harm to UCSC. UCSC reserves the right to pursue all legal and equitable remedies in response to such breaches.

Stakeholders must take reasonable precautions to protect Confidential Information. Any loss, theft, or other compromise must be reported immediately to the UCSC Executive Director.

# **Policy Breach**

Any breach of this Policy will be treated as a serious infraction. Stakeholders found to be in violation may face disciplinary action, at the sole discretion of UCSC, up to and including expulsion from UCSC and/or Skate Canada.