

# PMI PHOENIX CHAPTER POLICY STATEMENT

## Confidentiality Policy

**Approved by Board of Directors on: 3/25/19**

### **Policy Statement**

All organizations have a need for confidentiality in some of their business operations. These policies and procedures address how the PMI Phoenix Chapter, Inc. (Chapter) will manage, handle and control confidentiality in the day-to-day business of the corporation. This policy applies specifically to the Board of Directors and volunteers.

### **Purpose**

From time to time, Chapter volunteers are required to have access to and use confidential, sensitive and proprietary information and/or data. In such situations, confidentiality is in the best interests of the Chapter and its members, since disclosure could injure individuals and organizations both inside and outside the Chapter. In addition, disclosure could involve unfair business advantage, personnel action and other risks. Thus, the Chapter desires to establish a clear, reasonable, and fair standard for confidentiality applicable to the Chapter Board of Directors and volunteers for such matters.

### **Desired Results/Objectives**

- The Chapter Board of Directors and volunteers will have a clear understanding of the Chapter's need for confidentiality in some of its operations.
- The Chapter Board of Directors and volunteers will understand
  - the kind of information deemed confidential by the Chapter
  - how to mark information as confidential.
  - how Chapter confidential information needs to be handled
  - how to appeal the designation of material marked confidential
  - how breaches of confidentiality will be handled.
- The Chapter Confidentiality Policy will minimize the potential for confidential, sensitive and proprietary information or data to be compromised. Further, this policy will minimize the risk of Chapter Board members and volunteers being accused of inappropriate activity or the appearance of impropriety.

### **Definitions**

For the purposes of this policy, any information, material or data that the organization considers and treats as confidential, sensitive or proprietary, and is not in the public domain through due process of PMI or the Chapter, shall be defined as confidential, whether or not it is explicitly marked as such.

Information that is confidential, sensitive or proprietary may result from various activities and sources. These may include but are not limited to:

- Current and prospective membership and component records, including personal/business data.

- Information generated by self-regulatory proceedings, such as ethics and professional conduct investigations, certification, standards setting, accreditation or other business or governance enforcement.
- Opinions and other privileged information received from inside or outside legal counsel or other learned experts.
- Minutes and notes of any Chapter or Chapter-sponsored group executive or closed session.
- Chapter financial statements and documents, as well as other financial information.
- Certain business and financial discussions, agreements and financial data including budgets, information about programs, projects, products and services under development as well as data generated through confidential merger or acquisition processes or other cooperative or partnership agreements.
- Trade secrets or confidential information generated through the Chapter's business endeavors or shared with the Chapter by outside business concerns on the condition of maintenance of confidentiality.
- Programs, products and services being developed but not yet made public.

### **Persons Affected**

Chapter Board of Directors and volunteers are bound by this Policy.

### **Responsibilities**

Participation on the Chapter Board of Directors or as a Chapter volunteer constitutes acceptance of the terms of this Policy and its requirements. This Policy does not imply any license to individuals to use for their personal or business activities, any PMI or Chapter proprietary information or intellectual property, regardless of whether or not it is deemed confidential under this policy.

### **Procedures**

1. **Authority** – Where legitimate reasons for confidentiality, such as those in the Definitions section but not limited but those examples, the Chapter Board of Directors and volunteers are authorized to formally designate information for which they are accountable as confidential.
2. **Disclosure** – Individuals accountable under this policy may not purposefully disclose confidential, sensitive or proprietary information within or outside the Chapter except to individuals known to be authorized to receive such information. Such individuals shall act with due care to avoid the inadvertent disclosure of such information to anyone else and to avoid its use for personal gain or the advantage of other organizations or entities.
3. **Policy Usage** – Care must always be used to avoid overuse and misuse of this policy. The Chapter requires a high degree of openness to function properly and with due regard for the interests of all of the Chapter's members. Care shall be exercised at all times in the designation and usage of confidential information.
4. **Appeal of Confidential Markings or Determinations** – Appeals from individuals and entities requesting access to, or removal of the confidential status from information classified as confidential under this Policy may be made in writing to the President of the Chapter. The decisions of the President will be final.
5. **Forms** – All members of the Board of Directors and volunteers will sign a form acknowledging the Chapter's Confidentiality Policy as a condition of participation on any Chapter-sponsored group.
6. **File Retention** – The Chapter Board of Directors will forward the forms to the Chapter Vice President Operations for retention. The Chapter Vice President Operations will retain the forms during the life of the group and the forms will be archived when the group is disbanded. Archives will be retained for seven years.

7. Violations – Apparent violations of this Policy, including but not limited to, the failure to make adequate and full disclosure, may be referred to the Ethics Review Committee under PMI's Member Ethics Case Procedures at the discretion of the cognizant Chapter member, who may consult with the Chapter Board of Directors for assistance.