

The Mosaic Project Confidentiality Policy (including Information Disclosure and Records Privacy)

Introduction

Members of The Mosaic Project community whose position responsibilities involve interaction with The Mosaic Project's information systems and/or paper documents must understand that direct access to The Mosaic Project's information systems and/or paper documents may result in access to confidential and valuable data which must be protected.

While every effort is made to limit access to confidential information to those individuals with a "need to know", users may intentionally or unintentionally gain access to other data. Proprietary and Confidential information shall be accessed by individuals with the understanding that they use the information only in the conduct of their official duties, and that no information will be disclosed to any person who does not have an official "need to know". Unless specifically stated in writing, all information owned by The Mosaic Project with the exception of PR materials and information already disclosed to the public, is covered by this policy and is to be treated as "Proprietary or Confidential information" for official internal use only. Inappropriate disclosure or use of Proprietary or Confidential information may be unlawful under state and/or federal law and expose The Mosaic Project and/or the employee/volunteer to liability.

Confidentiality and Privacy

The Mosaic Project has a vital interest in maintaining security of Proprietary and Confidential information of which it is the owner and/or steward. Proprietary information includes all information to which employees, board members, volunteers have access to in the course of their work with The Mosaic Project. Confidential information is any information that is not known generally to the public. Examples of Proprietary and Confidential information include (but are not limited to):

- student information
- medical information
- personnel files
- computer records
- donor information
- financial information
- curriculum, training materials and other Program information
- strategic/marketing/fundraising plans
- mailing lists.

The Mosaic Project is required by law to protect the privacy of some Proprietary and Confidential information mentioned above (such as medical information, social security numbers, and other personal information). Further, The Mosaic Project's future success depends upon protecting Proprietary and Confidential information (including our curriculum, donor lists, etc).

Procedures

To ensure the secure and proper use of this data, and out of respect for the privacy of others, the following operational principles have been established.

- Computer files, especially the database, may not be copied for use on any personal computer without express written permission of the Executive Director.
- The confidentiality of passwords for any of The Mosaic Project's computer systems must be strictly maintained.
- All confidential information must be maintained and viewed in the strictest of confidence. The information viewed will not be shared in any manner with others who are unauthorized to view such data.
- Use of The Mosaic Project's data for profit or personal purposes is prohibited.
- Electronic or paper copies of sensitive data may not be given, sold, or shared with anyone without the express written consent of the Executive Director.
- All copies of paper data containing Proprietary and Confidential information must be shredded or otherwise destroyed in a manner protecting the privacy of individuals and the confidentiality of the information.
- Inappropriate use of privileges to access and use information may result in disciplinary action, loss of access to the system, and possible sanctions up to and including dismissal. In addition, legal action may be taken against individuals personally, and The Mosaic Project will not defend any violation of this policy.

Information Disclosure

Employees, board members, and volunteers may not use or disclose Proprietary or Confidential information, except as required by their jobs. This prohibition applies both during and after employment (or volunteer work) with The Mosaic Project. Inappropriate or unauthorized use or disclosure of Proprietary or Confidential information is a violation of this policy and will subject the violator to appropriate disciplinary action, up to and including termination of employment and/or legal action, including penalties and lawsuits for injunctive relief and money damages, as well as possible criminal charges. Third parties whose information is disclosed may also have a private cause of action against individuals who improperly disclose information, and The Mosaic Project would not be required to defend or indemnify involved individuals.

Examples of inappropriate disclosures include (but are not limited to) making an electronic, photographic, or paper copy (or allowing someone else to do so) for personal use or to give, sell, trade or otherwise disclose any of the following:

- personal (student, teacher, staff, or volunteer) records, especially medical records
- personnel files
- The Mosaic Project's database or reports therefrom
- The Mosaic Project's financial software or financial files or reports
- The Mosaic Project's curriculum, training materials, or other Program information

During the course of employment or volunteer work with The Mosaic Project, employees or volunteers may be required to provide information to certain government and/or regulatory

agencies. Where disclosure of information is required, employees/volunteers must ensure their conduct and communications are consistent with the policies and procedures of The Mosaic Project and all applicable laws. Questions about disclosure of information or employees'/volunteers' legal obligations should be directed to the Executive Director.

Disposal of Confidential Documents

Subject to record retention requirements, documents containing Proprietary and Confidential information must be shredded, torn, or cut into pieces such that the information is no longer recognizable prior to its being placed in trash or recycling bins. Likewise, electronic storage media (for example, diskettes, compact disks, tapes, disk drives, etc.) containing confidential information or restricted-release information must be completely erased, reformatted, or destroyed prior to being discarded.

Acknowledgement

I have read the foregoing rules and understand that my compliance is an ongoing condition of employment and/or of my involvement with The Mosaic Project. I understand that if I violate these rules I may be subject to disciplinary action, up to and including termination of my employment, legal action, and possible criminal charges.

Employee/Volunteer Name

Date