



GREATER TEXAS FOUNDATION

## **Confidentiality of Information Policy**

### 1.0 Purpose

This policy establishes guidelines to protect against the unauthorized disclosure of sensitive or confidential company information.

### 2.0 Persons Affected.

The Board of Directors, including the President & CEO, as well as any employee with access to or knowledge of sensitive or confidential company information.

### 3.0 Policy

This policy of the Greater Texas Foundation prohibits the unauthorized disclosure of sensitive or confidential company information. Violations to this policy may result in a negative impact to the Foundation.

### 4.0 Definitions

4.1 Sensitive or Confidential Information. Any information concerning:

4.1.1 grantees (especially financial or proprietary information);

4.1.2 student loan borrowers, foundation financial documents;

4.1.3 foundation investments, or any and all foundation matters unless that information is already generally available to the public: or

4.1.4 employee information regarding salaries, wages, and performance reviews.

### 5.0 Responsibilities

5.1 It is the responsibility of the Board of Directors, the President & CEO, and all employees with access to or



GREATER TEXAS FOUNDATION

knowledge of sensitive or confidential company information to be familiar with and follow the guidelines established in this policy.

- 5.2 It is the responsibility of the President & CEO or designee(s) to maintain and update this policy as needed.

## 6.0 Procedures

- 6.1 Employees should take care not to disclose confidential information acquired in the course of his/her work to anyone outside the foundation. Any information concerning grantees (especially financial or proprietary information), student loan borrowers, foundation financial documents, foundation investments, or any and all foundation matters should be held in the strictest confidence unless that information is already generally available to the public.
- 6.2 Confidentiality should also be observed regarding foundation employees and between employees. Employee information regarding salaries, wages, and performance reviews is private and confidential in nature.
- 6.3 Employees involved in improper disclosure of information will be subject to disciplinary action, up to and including termination of employment.
- 6.4 In all events, the foundation will disclose information as required by law.