

Penn Estates Property Owners Association

POLICY RESOLUTION: CONFIDENTIALITY POLICY
SUBJECT: Confidentiality Policy
DATE APPROVED: April 5, 2019

NO: A-004
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Purpose: The purpose of this policy is to protect "Confidential Information" that is critical to the operation of Penn Estates Property Owners Association ("PEPOA").

1. "Confidential Information" shall mean any information regardless of the form in which it exists (as well as all analyses, discussions and processing of that information) that is provided to or received by a Board Member or Officer in that individual's capacity as an officer or director of PEPOA and that is classified under law as confidential, private or legally privileged. A partial list of Confidential Information includes matters related to employment and employee reviews, employment agreements, disciplinary actions or recommendations, other contracts or legal documents under negotiation, legal opinions, litigation strategy and tactics, plus executive session discussions and minutes. The Board of Directors, by majority vote for good cause, may also deem other information as confidential. "Confidential Information" does not include information that is publicly available or available without restriction for inspection by members of PEPOA on request.
2. Duty. It is the duty of all of the Officers, Directors, committee members, employees, contractors and agents of PEPOA who have knowledge of Confidential Information to maintain all Confidential Information in strict confidence. During their period of service to PEPOA, and thereafter, these same persons shall not disclose Confidential Information to any unauthorized persons or parties, nor use Confidential Information for their own purposes once obtained by them. Upon termination of their period of service to PEPOA, they must immediately return to PEPOA the original and all copies of any such information or materials. Individuals who have access to Confidential Information must ensure that the information is handled in strict compliance with this policy and with applicable legal requirements regarding the safeguarding of confidential information.

3. Breach. Failure to maintain the confidentiality and security of this information shall be grounds for disciplinary action, and, for proper cause, removal from employment, office or other positions within PEPOA. This duty of loyalty and confidentiality is essential to protect the interests and goals of PEPOA. Any violation of this policy will cause irreparable harm to PEPOA.
4. Meeting Procedures. Any Confidential information that is to be reviewed at a meeting shall not be routinely distributed prior to meeting. If it is necessary to distribute confidential information prior to or at meetings, that information shall not be reproduced, plus the following additional precautions shall be observed:
 - a. the material shall be clearly marked as Confidential;
 - b. distributed copies of the confidential information shall be numbered;
 - c. each numbered copy shall be returned to the legal custodian before the adjournment of the meeting at which it is reviewed;
 - d. all numbered copies shall be destroyed by the legal custodian; and
 - e. the original shall be retained in a secure location.
5. All person's subject to this Policy shall when requested sign a form provided by the Board of Directors acknowledging their obligations and under this Policy.

Adopted by resolution of the Association's Directors on this 5th day of April, 2019.


_____, Secretary


_____, President