

Confidentiality Policy and Agreement

(amended 10/19/19)

Respecting the privacy of our clients, donors, members, staff, volunteers and of the Island Housing Trust Corporation ("IHT") itself is a basic value we adhere to. Personal and financial information, except as described below, is confidential and should not be disclosed or discussed with anyone without permission or authorization from the IHT Executive Director. This policy and agreement is applicable to all IHT employees, Board Members, Officers, Committee Members, and volunteers.

For the purposes of this agreement, "Information" means:

- the names, identities and any personal information (such as social security numbers, addresses, tax returns, tax filings, credit reports, mortgage or credit applications, applications for housing assistance etc.) ("personal information") of prospective, current and former owners and tenants and their family members;
- any personal information of employees, board members and volunteers and their family members;
- IHT's financial records and data, applications for financing, business plans, strategies, business records and contracts, opportunities for real estate development, offers to purchase real estate and purchase and sale agreements, negotiating positions, deliberations and votes of the board personnel records and any other matters that would be considered private or privileged and not intended for public dissemination.

All Information that is not otherwise public knowledge (including but not limited to Information already voluntarily disclosed by the person or entity involved to the press or to a governmental entity where such disclosure is not confidential) is "Confidential Information".

Board members, volunteers and employees shall use Confidential Information solely for the purpose of performing services on behalf of IHT. Pursuant to this agreement and IHT policy, you are not permitted to disclose any Confidential Information to persons or entities outside IHT. As to clients' and donors' names, you shall not reveal any information that could make their identities known. No Confidential Information may be released without appropriate authorization from the IHT Executive Director or unless you are compelled to disclose it pursuant to the order of a court or other governmental or legal body having jurisdiction over such matter.

IHT expects you to respect the privacy of clients and donors and to maintain all Confidential Information. Staff members are responsible for maintaining the confidentiality of information relating to other staff members and volunteers, in addition to clients and donors.

It is the policy of IHT that Confidential Information shall not be disclosed both during and after employment or volunteer service. Staff and volunteers, including board and committee members, are expected to return materials containing privileged or Confidential Information at the time of separation from employment or expiration of service.

Failure to maintain confidentiality or unauthorized disclosure of Confidential Information is a serious violation of this policy and may result in termination of your employment, board service or volunteer service, or other corrective action. This policy is intended to protect you as well as IHT because in

extreme cases, violations of this policy also may result in personal liability.

Before you begin your assignment as a staff member/volunteer, you should be aware of the laws and penalties for breaching confidentiality. Although IHT is liable for your acts within the scope of your duty, giving Confidential Information to an unauthorized person could result in IHT's refusal to support you in the event of legal action. Violation of the state statutes regarding confidentiality of records is punishable upon conviction by fines or by imprisonment or by both.

Board members, volunteers and staff shall also comply with IHT's Policy on External Communications and Social Media, attached.

Certification

I have read IHT's Confidentiality Policy and Agreement presented above and the Policy on External Communications and Social Media. I agree to abide by the requirements of the policies and inform my supervisor or, the Board President if I am a board member or volunteer, immediately if I believe any violation (unintentional or otherwise) of the policy has occurred. I understand that violation of this policy may lead to disciplinary action, up to and including termination of my service with IHT.

Signature_____Name_____Date _____