



CONFIDENTIALITY Policy Statement

Board members, employees and volunteers of the Parasol Tahoe Community Foundation (Parasol) may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with Parasol to any person, including relatives, friends and business and professional associates, other than to persons who have a legitimate need for such information and to whom the Parasol Board or Executive Committee has authorized disclosure. Board members and employees shall use confidential information solely for the purpose of performing services as a board member or employee for Parasol. This policy is not intended to prevent disclosure where disclosure is required by law.

Information that should always be considered confidential includes but is not limited to:

1. Donor information, unless disclosure is authorized by the donor or required by law
2. All information on personnel matters, except where disclosure is required by law (such as disclosure of compensation for the highest paid individuals on the Form 990)
3. Terms and conditions of grants and contracts
4. Financial records, including all account numbers and account information, except for audit reports
5. Minutes of Board and Board Committee meetings, except for providing Board meeting minutes to members of the Emeritus Board
6. Strategic plans and business plans, except for communication of the Donald W. Reynolds Nonprofit Center business plan to the Incline Village General Improvement District
7. Information about copyrights, trademarks, patents and other intellectual property where disclosure could jeopardize Parasol's intellectual property rights
8. Legal counsel opinions
9. All information about individuals or organizations seeking assistance through the Foundation or its funded agencies and collaborators
10. Any materials specifically marked as "confidential" as approved by both the CEO and Board Chairperson or, in the absence of the Board Chairperson, the Vice Chairperson.
11. Discussions occurring during meetings or portions of meetings that are designated as confidential discussions; this applies to internal meetings as well as meetings with non-Parasol individuals and other organizations

Otherwise confidential information can be released or made available for review in response to a written request from a government agency or a subpoena for records in connection with a civil lawsuit, a criminal prosecution, or an administrative proceeding.

Questions about whether certain information is "confidential" under this policy should be referred to the Governance Committee.

Access to confidential information by Parasol representatives other than Directors, including but not limited to employees, volunteers and contractors, will be restricted to those who have a legitimate need for such information as determined by the CEO. Parasol representatives with

access to confidential information will safeguard all such information in the manner specified by the CEO in order to prevent unauthorized disclosure.

All employees and board members must sign an agreement acknowledging their understanding of the confidentiality policy, including their agreement to refrain from disclosure of confidential information even after termination of employment or separation from the Board.

Penalties for violating these confidentiality policies can include sanction or termination of employees and removal of board members.

At the end of a board member's term in office or upon the termination of an employee's employment, he or she shall return, at the request of Parasol, all documents, papers, and other materials, regardless of medium, that may contain or be derived from confidential information in his or her possession.