



Confidentiality Policy

1. Duty of Confidentiality

In accordance with the Bylaws of the School, each Trustee or other person receiving confidential information, shall keep confidential and shall not, without the prior consent of the Board, disclose any confidential information presented or made available to or discussed by the Board, or any committee of the Board, regardless of whether such confidential information was discussed, presented or made available at any formal, informal, special or regular meeting of the Board or any committee of the Board.

2. Scope of Confidential Information

- a. Confidential Information. For purposes of this policy, confidential information includes information, material or matter related to the business operations and financial condition or affairs of the School; information, material or matter related to the business operations and financial condition or affairs of an organization that is affiliated with the School; information, material or matter specified or identified by any Trustee or committee member as sensitive or subject to any rights of privacy or contractual confidentiality obligations; any information, material or matter required by law, rule or regulation to be kept confidential and not publicly disclosed or disseminated; any information, material or matter that the Board or any committee may from time to time declare to be confidential; and any actions taken by the Board or a committee related to any information, material or matter described above.
- b. Exclusions. Excluded from the restrictions above and the definition of confidential information is any information, material or matter that is required by law, rule or regulation to be disclosed; at the time of disclosure or discussion is in the public domain, or after disclosure becomes, through no fault of any Trustee, part of the public domain as evidenced by generally available documents or publications; or

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Date adopted: April 30, 2019

Date to be reviewed: September 1, 2022

Responsible: Committee on Trustees

was available to Trustees on a non-confidential basis prior to its disclosure to the Board.

3. Execution of Certificate and Annual Confirmation.

Upon adoption of this policy, and at the beginning of each fiscal year thereafter, each Trustee or other person subject to this policy shall be required to complete and submit a Certificate of Acknowledgment in substantially the form attached hereto.

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