



Episcopal SeniorLife Communities Corporate Policy

Policy Name: Corporate Confidentiality

Policy: It is the policy of Episcopal SeniorLife Communities (ESLC) to ensure confidential information is protected at all times. Employees, board members, contractors and volunteers will unavoidably come in contact with confidential and proprietary information that is not available to the public regarding the organization, residents, their families and other staff members. The protection of confidential business information is vital to the interests and the success of ESLC. Such confidential information includes, but is not limited to, the following examples:

- resident lists
- resident personal information
- medical records
- financial information
- marketing strategies
- pending projects and proposals
- employee personal information

It is the responsibility of each individual not to share non-public information with any unauthorized person inside or outside ESLC. Furthermore, under the Health Insurance Portability and Accountability Act (HIPAA) we are all responsible for protecting the privacy of residents' and staff's medical records and other health information.

Policy Purpose: The purpose of this policy is to ensure all proprietary, health related, resident and staff information and materials are kept confidential.

Policy Scope: This policy applies to all ESLC.

Procedures:

Board Members:

Board Members and key personnel, upon election or hire and then annually thereafter, complete a Confidentiality Agreement, attached.

Employees, Contractors, and Volunteers:

Refer to the *Confidentiality Policy* in the Employee Handbook

Reviewed: September 2022

Approved by: Lisa J. Marcello, President/CEO
Episcopal SeniorLife Communities

A handwritten signature in cursive script, appearing to read "Lisa J. Marcello".

Board Approved: September 21, 2021



Confidentiality Agreement

The undersigned recognizes and agrees that any information that is obtained through activities related to his or her role as a Board Member of Episcopal SeniorLife Communities and its affiliates, or as a member of the management team which is proprietary, health related, including resident and staff related information and materials are kept confidential. The undersigned agrees to maintain all information, whether or not specifically identified as confidential and proprietary in strictest confidence, absent specific authorization to release or disclose information to third parties by the Board of Directors or its duly authorized representative, the President and CEO.

Name: _____

Position: _____

Date: _____

Signature: _____