

CONFIDENTIALITY POLICY
OF
COHASSET COMMUNITY ASSISTANCE FUND, INC.

ARTICLE I
Scope

This Confidentiality Policy (the “Policy”) applies to all directors, committee members, consultants, staff members, employees, and relevant volunteers (individually and collectively, “Personnel”) of Cohasset Community Assistance Fund, Inc. (the “Organization”).

ARTICLE II
Definition of Confidential Information

Confidential Information includes, but is not limited to:

- i. Any plans, processes, or reports;
- ii. Financial and marketing information;
- iii. Strategic plans;
- iv. Compensation;
- v. Donor lists and donors;
- vi. Grantee lists;
- vii. Personal information;
- viii. Proprietary information;
- ix. Trade secrets;
- x. Strategy and executive board decisions;
- xi. All customized software;
- xii. Security and technical information; and
- xiii. Any information belonging to grantees, donors, or any other third party person or entity the Organization transacts.

Confidential Information includes such information, whether furnished before or after the date this Policy was enacted, oral or written, regardless of the form of communication or the manner in which it is furnished.

Confidential Information also includes all information that is marked or otherwise identified as confidential or that would otherwise appear to a reasonable person to be confidential or proprietary in the context and circumstances in which the information is known or used. When in doubt as to whether certain information is Confidential Information, Personnel may request clarification from the President and treat such information as Confidential Information until informed otherwise by the President.

Except for personal information and proprietary information, Confidential Information does not include any information that is (a) already known by the Personnel at the time of the disclosure, (b) publicly known at the time of the disclosure or becomes publicly known through no wrongful act or failure of the Personnel, or (c) subsequently disclosed to the Personnel on a non-confidential basis by a third party not having a confidential relationship with the owner and which rightfully acquired such information.

ARTICLE III Use and Disclosure

Personnel will not disclose Confidential Information belonging to the Organization or obtained, accessed, or made available through their affiliation with the Organization to any person, including, but not limited to, relatives, friends, and business and professional associates, unless and to the extent necessary to advance the charitable purposes of the Organization or unless the Organization has authorized disclosure. This Policy is not intended to prevent disclosure of Confidential Information where such disclosure is required by law or court order.

Personnel are expected to use reasonable efforts and to demonstrate professionalism good judgment, and care at all times in handling any information related to the Organization to avoid unauthorized or improper disclosures of Confidential Information.

Personnel agree to refrain from using any such Confidential Information after they complete their service with the Organization. At the end of a Personnel's services, such Personnel will, at the Organization's request, return or destroy all documents, papers, and any other materials, regardless of medium, in such person's possession, custody, or control which may contain or be derived from Confidential Information.

ARTICLE IV Unauthorized Disclosure

Personnel will inform the President immediately upon becoming aware of any actual or suspected violation (unintentional or otherwise) of this Policy.