



Confidentiality Policy

The nature of Horizon Community Funds' role as a funder, leader, convener, and decision-maker in the Northern Kentucky community results in the acquisition of extensive information that in many cases is considered confidential and, in some limited cases, may also be privileged. Much information is shared with Horizon Community Funds because of the third party's belief that the organization can be trusted and will make fair decisions. To safeguard Horizon Community Funds' reputation and integrity as a responsible decision-maker and to protect its capacity to gather data necessary to make those decisions, Horizon Community Funds subscribes to the following policies regarding Council members', Council Committee members', Task Force members', Officers' and staff's obligations regarding maintaining the confidentiality of Horizon Community Fund matters.

Policy:

Horizon Community Funds Council members, Council Committee members, Task Force members, Officers and staff shall not disclose or otherwise use any Confidential Horizon Information (except when engaged in the business of the Horizon Community Funds). For purposes of this Policy, the term "Confidential Horizon Information" shall mean all non-public information relating to Horizon Community Funds' operational, strategic and financial affairs, including, without limitation, those documents, materials and internal or external discussions which have been identified as being confidential and/or subject to a confidentiality agreement.

Furthermore,

- (i) the meetings of the Council of Trustee, Council Committee and Task Force; (ii) the positions or statements of individual Council of Trustee members, Council Committee members and Task Force members, Officers or staff; and (iii) the internal communications (in whatever form) among members of the Council of Trustee, Council Committee and Task Force, Officers and staff shall be considered to constitute "Confidential Horizon Information", unless otherwise affirmatively identified by the President as public information; and
- the content of Horizon Community Funds' own documents or those of any third party entrusted to its care (in whatever form) or any analysis of such documents, shall be

considered to contain Confidential Horizon Information and therefore not subject to disclosure to any third party, unless otherwise identified by the President as a public document; and

- all information about the names of donors, or the amounts of funds or contributions, shall be held in utmost confidentiality by the management and staff as well as the Council of Trustees. A donor may feel he or she wants to mention their participation or may provide approval for being named in publications or for other designated marketing purposes. This shall not release the organization or its employees from revealing the donor's name or other information beyond those purposes that were approved by the donor. Such confidentiality shall apply to family, and other significant relationships. Breach by an individual bound by this policy shall be cause for termination.

Approved by the Council of Trustees on March 20, 2018.