

## ***(2) Confidentiality Policy***

It is the policy of XYZ that trustees and employees of XYZ may not disclose, divulge, or make accessible confidential information belonging to, or obtained through their affiliation with XYZ 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 XYZ has authorized disclosure. Trustees and employees shall use confidential information solely for the purpose of performing services as a trustee or employee for XYZ. This policy is not intended to prevent disclosure where disclosure is required by law.

Trustees and employees must exercise good judgment and care at all times to avoid unauthorized or improper disclosures of confidential information. Conversations in public places, such as restaurants, elevators, and airplanes, should be limited to matters that do not pertain to information of a sensitive or confidential nature. In addition, trustees and employees should be sensitive to the risk of inadvertent disclosure and should for example, refrain from leaving confidential information on desks or otherwise in plain view and refrain from the use of speakerphones to discuss confidential information if the conversation could be heard by unauthorized persons.

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