	LEVEL 2 FOUNDATION POLICY: PMIEF COO authors and approves and the PMIEF Board monitors	No.:
		Date Approved:
POLICY TITLE:	Confidentiality Policy	Rev No.:
		Rev Date:
RESPONSIBILITY OF:		Page: 1 of 4
PREPARED BY: Diane Fromm/Marjorie Gordon		APPROVED BY: PMIEF Board

I. POLICY STATEMENT:

This policy addresses how the Project Management Institute Educational Foundation ("PMIEF" or the "Foundation") will manage, handle and control confidential information relating to its business activities, finances and persons who are active on behalf of the organization, including staff, donors and volunteers. This policy applies to PMIEF and all PMIEF Volunteer Groups, as defined below.

II. PURPOSE:

In the course of their duties or volunteer activities for PMIEF, PMIEF volunteers and staff may have access to and may use confidential information, as defined below ("Confidential Information"). An improper disclosure of Confidential Information could injure PMIEF and individuals and organizations associated with PMIEF, or could result in an unfair business advantage to third parties, as well as other risks. PMIEF is committed to preserving the confidentiality and proper use of Confidential Information, and has implemented this policy to establish clear, reasonable and fair standards for identifying and handling Confidential Information.

III. DESIRED RESULTS/OBJECTIVES:


1. Staff assigned to PMIEF will have a clear understanding of PMIEF's need for confidentiality in its operations.
2. PMIEF volunteers will understand the kind of information deemed confidential by PMIEF, how they can mark information confidential, how they should handle PMIEF confidential information, how they can appeal the designation of material marked confidential, and how breaches of confidentiality will be handled.
3. The PMIEF Confidentiality Policy will minimize the potential for Confidential Information to be compromised. Further, this policy will minimize the risk of PMIEF volunteers and staff being accused of inappropriate activity or the appearance of impropriety.

IV. DEFINITIONS:

"Confidential Information" refers to any non-public information, materials or data relating to PMIEF or persons associated with PMIEF that the Foundation treats as sensitive, proprietary or not for public disclosure. Information that falls within this definition must be considered Confidential Information, whether or not it is explicitly marked as such.

Confidential Information may include but is not limited to:

1. Donor and prospective donor information;
2. Employee information, including personnel records, compensation information, and medical records or data ;

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3. Information generated by self-regulatory proceedings, such as ethics or professional conduct investigations and certification, standards-setting, accreditation or other business or governance-related proceedings ;
4. Opinions or other work product received from inside or outside legal counsel;
5. Opinions, analyses or other prepared materials from learned experts, including staff;
6. Executive or closed session meeting information, including minutes and notes of meetings of any PMIEF sponsored group;
7. Financial statements and executive financial summaries;
8. Business, marketing and financial projections, statements, analyses, agreements and data. This includes without limitation multi-year program plans and budgets, information about strategies, programs, projects, products and services under development, data generated through confidential merger or acquisition processes, and other cooperative or partnership agreements;
9. Trade secrets;
10. Commercial information generated through PMIEF's business endeavors, or shared with the Foundation by outside business concerns on the condition of maintenance of confidentiality;
11. Confidential information of the Project Management Institute ("PMI"), including without limitation information in all of the above categories

"PMIEF Volunteer Groups" refers to PMIEF sponsored activities, including but not limited to project teams, groups, advisory groups, Board committees or other committees or groups formed by PMIEF.

"Group Leader" means the individual who is responsible for the operation of the PMIEF Volunteer Group, as established in the applicable PMIEF governing document, charter, job description or other delegation of authority by the appropriate PMIEF authority.

V. PERSONS AFFECTED:

PMIEF volunteers and staff are bound by this Policy.

VI. DISSEMINATION:

Internal: Staff assigned to PMIEF


External: Volunteers and public at large

VII. ACCEPTANCE OF TERMS:

Acceptance of a staff assignment to PMIEF or participation as a PMIEF Volunteer constitutes acceptance of the terms of this Policy.

VIII. PROCEDURES:

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1. **Authority:** Members of the PMIEF Board and their designees, PMIEF executives and their designees, PMIEF staff, and leaders of PMIEF Volunteer Groups may use Confidential Information as appropriate to perform their respective duties on behalf of PMIEF. Where it is determined that information, materials or data constitute Confidential Information, the foregoing persons are authorized to formally designate information for which they are accountable as "Confidential Information".

2. **Disclosure:** Persons who receive or have access to Confidential Information may not disclose Confidential Information within or outside the Foundation, except to individuals known to be authorized to receive such information. Such individuals shall act with all due care to avoid the inadvertent disclosure of such information to non-authorized persons, and to avoid its use for personal gain or the advantage of other organizations or entities.

3. **Policy Usage:** This policy shall be interpreted and applied in a reasonable manner with due consideration for the preservation of confidentiality, where appropriate, and for the Foundation's need to operate with a high degree of openness. Care must always be taken to avoid misuse of this policy.

4. **Appeal of Confidential Markings or Determinations:** Appeals from individuals and entities requesting access to Confidential Information, or the removal of the confidential status from Confidential Information, which has been classified as confidential by a PMIEF Volunteer Group under this policy, may be made in writing to the PMIEF Chief Operating Officer. Decisions of the Chief Operating Officer on such matters shall be final.

Appeals concerning information classified as confidential by the PMIEF Board of Directors or a Board Sponsored Group may be made in writing to the Chair, PMIEF Board of Directors, whose decision on such appeals shall be final.


5. **Forms:** All PMIEF volunteers and staff will sign a form acknowledging PMIEF's Confidentiality Policy as a condition of participation on any PMIEF Volunteer Group or assignment to a PMIEF staff position. The current form is attached to this policy. If a group leader believes that modification would serve the interests of PMIEF, the form may be tailored with the explicit concurrence of the PMI General Counsel or the designated representative from the PMI Legal Department.

6. **Records Management:** Upon receipt of signed forms acknowledging receipt of copies of this policy or receipt of any other documents relating to the implementation of this policy, the PMIEF Volunteer Group Leader will forward the forms to the PMI Legal Department for retention in accordance with PMI/PMIEFs Records Management Policy

7. **Violations:** Notice of perceived violations of this policy should be forwarded to the appropriate individual as described in PMI's Policy on Complaint, Dispute, and Grievance Resolution. Any such matters may be further referred to the Ethics Review Committee under PMI Ethics Case Procedures.

XI. LIMITATIONS

Nothing in this policy is intended to limit PMIEF executives or staff in performing their regular duties on behalf of the Foundation. This policy does not grant or imply any license to
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individuals to use for their personal or business activities any PMIEF proprietary information or intellectual property, regardless of whether it is deemed confidential under this policy.

XII. RELATED POLICIES, SUPPORTING DOCUMENTATION AND/OR APPENDICES:

PMIEF Confidentiality and Records Compliance Agreement; PMIEF Policy on Conflict of Interest; PMIEF Records Management Policy; PMI Policy on Complaint, Dispute and Grievance Resolution; PMI Ethics Case Procedures; and PMI Employment Guide.

**PMI EDUCATIONAL FOUNDATION
CONFLICT OF INTEREST QUESTIONNAIRE AND ETHICS CERTIFICATION**

PMI Educational Foundation Officers, Board Members, and Board
Committee/Center/Council/Team Members

Name _____

PMI Educational Foundation Office or Position You Hold or You Will Assume _____

PLEASE NOTE: The PMI Educational Foundation (PMI-EF) governing documents require that this Questionnaire and Certification be completed accurately on an annual basis and returned to the Executive Director at PMI Headquarters. PMI-EF Officers, Directors, and Board Committee/Center/ Council/Team Members are expected to be aware of all corporate, personal, and family business interests and relationships that may involve or relate to PMI-EF in any way. Officers, Directors, and Committee Members must openly and accurately reveal these interests and relationships to PMI in this questionnaire; and must comply with all PMI-EF policies and requirements concerning ethics, conflicts of interest, and related matters.

If you are uncertain whether particular business interests or relationships involve PMI-EF, please contact the PMI-EF Executive director to review the matter. Upon request, PMI-EF can provide a list of companies, organizations, and individuals with whom the Foundation has, or is considering, a business relationship.

Thank you for your cooperation in providing accurate responses to the following questions.

In responding to these questions, please note that a “yes” answer does not imply that the relationship or transaction was necessarily inappropriate.

1. Have you been, within the past twelve months, an officer, director, or principal of any corporation, company, association, institution, or other business with which PMI-EF has any business relationship or interactions, including professional or service relationships?

Yes _____ No _____

If the answer to this question is “yes,” please specifically identify: the names of such corporations, companies, associations, institutions, and/or businesses; the office or other position you held or hold; the nature of the business-relationship or dealings with PMI-EF; and, the approximate dollar-amount of business involved with PMI-EF during the last year.

2. Other than incidental stock ownership through a portfolio, do you, or does any member of your family, have an ownership, financial, or other interest in, or receive any benefit, remuneration or income from, any corporation, company, association, institution, or other business with which PMI-EF has any business relationship or interactions, including professional or service relationships?

Yes _____ No _____

If the answer to this question is "yes," please supply the following information: (a) the names of all corporations, companies, associations, institutions, and/or businesses in which you or a family member hold such an ownership, financial, or other interest; (b) the nature of the respective interest held; (c) the nature and amount of each such benefit, remuneration, or income; and, (d) the name and relationship to you of each person holding such an interest or receiving such a benefit, remuneration, or income:

3. Within the past twelve months, did you or any member of your family receive any gifts, in-kind support or services, reimbursement, loans, or other benefits from any corporation, company, association, institution, or other business which sells, or otherwise provides, to PMI-EF any goods or services, or with which PMI-EF has any other business relationship or interactions, including professional or service relationships?

Yes _____ No _____

If the answer to this question is "yes," please identify all such gifts, in-kind support or services, reimbursement, loans, or other benefits, and specifically

identify: the person(s) receiving, and the source of, the gift, in-kind support or service, reimbursement, loan, or other benefit, including approximate fair value.

4. Were you involved in any other activity during the past year that reasonably could be interpreted as a possible conflict of interest, or reasonably could be viewed as having an appearance of a divided interest or loyalty on your part?

Yes _____ No _____

If the answer to this question is "yes," please describe the activity:

I certify that: (1) I have reviewed and understand all PMI-EF requirements, policies, rules, and procedures related to ethics, conflicts of interest, and related matters; (2) I am in compliance with all such PMI-EF requirements, policies, rules, and procedures; and, (3) the information I have provided in this questionnaire is true, accurate, and complete to the best of my knowledge. Should any information provided in my responses become incomplete or inaccurate, I understand that I am required and obligated to revise or supplement the information in a timely manner.

Signature

Date

Name (please print)