

Confidentiality Policy

Policy Level:	2	Responsible:
Effective Date:	January 2002	Vice President General Counsel and Corporate Secretary
		Accountable:
Last Update:	December 2020	President and CEO

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1. Purpose

All organizations have a need for confidentiality in some of their business operations. This policy addresses how the Project Management Institute (PMI) will manage, handle, and control confidentiality in the day-to-day business of the corporation; and applies to all member and non-member volunteers and staff members. It is in the best interests of the corporation, its components and members, since disclosure could injure individuals and organizations both inside and outside of PMI that a confidentiality policy exists.

2. Policy Statement

This policy establishes a clear, reasonable and fair standard for confidentiality applicable to PMI member and non-member volunteers and staff members. Stakeholders, through the policy, will understand the kind of information deemed confidential by PMI, how they can mark information confidential, how they should handle PMI confidential information, how they can appeal the designation of material marked confidential, and how breaches of confidentiality will be handled.

The PMI Confidentiality Policy will minimize the potential for confidential, sensitive and proprietary information or data to be compromised. Further, this policy will minimize the risk of PMI members, non-members, and staff members being accused of inappropriate activity or the appearance of impropriety.

Participation on a PMI Volunteer Groups constitutes acceptance of the terms of this Policy and its requirements. This policy does not grant or imply any license to individuals to use for their personal or business activities, any PMI proprietary information or intellectual property, regardless of whether it is deemed confidential under this policy.

2.1. Authority

Where legitimate reasons exist for confidentiality, such as those materials enumerated by way of example in Section 6 but not limited by those examples, the PMI Board, including its designee(s), the PMI Chair, the Chief Executive Officer, staff, and leaders of PMI Volunteer Groups are authorized to formally designate information for which they are accountable as confidential.

2.2. Disclosure

Individuals, accountable under this policy, may not purposefully disclose confidential, sensitive or proprietary information within or outside the corporation, except to individuals known to be authorized to receive such information. Such individuals shall act with due care to avoid the inadvertent disclosure of such information to anyone else, and to avoid its use for personal gain or the advantage of other organizations or entities.

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2.3. Policy Usage

Care must always be used to avoid overuse or misuse of this policy. The Institute requires a high-degree of openness to function properly, and with due regard for the interests of all of the Institute's global members. Care shall be exercised at all times in the designation and usage of confidential information.

2.4. Appeals of Confidential Markings and Determinations

Appeals from individuals and entities requesting access to, or removal of the confidential status from, information classified as confidential by a PMI Volunteer Group under this policy may be made in writing to the PMI Chief Executive Officer. The decisions, in response, of the Chief Executive Officer shall be final. Appeals concerning information classified as confidential by the PMI Board of Directors or a Board Sponsored Group may be made in writing to the Chair, PMI Board of Directors, whose decision is final.

2.5. Forms

All individual PMI members and non-members will sign a form acknowledging PMI's Confidentiality Policy as a condition of participation on any PMI Volunteer Group. The current form is attached to this policy. It is anticipated that the standard form attached will apply in most cases, however, if a leader believes that modification would serve the interests of PMI to make their group more productive the form may be tailored with the explicit concurrence of the PMI General Counsel or the designated representative from the PMI Legal Department.

2.6. Records Management

The PMI Volunteer Group Leader will forward the forms to the PMI Legal Department for retention in accordance with PMI's Records Management Policy. The Legal Department will retain the forms during the life of the group and the forms will be archived when the group is disbanded.

2.7. Violations

Apparent violations of this policy will be forwarded to the appropriate individual as described in PMI's Policy on Complaint, Dispute, and Grievance Resolution and may be further referred to the Ethics Review Committee under PMI's Member Ethics Case Procedures.

3. Policy Distribution

Internal:

- President and CEO
- **Vice President & General Counsel**
- All PMI Staff

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External:

- PMI Board of Directors
- PMI Volunteers
- PMI Members

4. Related Documents

Related procedures, forms, and other support documents enforce, maintain, and verify policy compliance. These procedures and forms support this policy:

Document Name	Document Type <small>(Procedure, Form, Template, Manual, User Guide, Guidelines, Governing Document, etc.)</small>
Confidentiality and Records Compliance Agreement	Form
PMI Policy on Conflict of Interest Policy	Policy
PMI Records Management Policy	Policy
PMI Policy on Complaint, Dispute and Grievance Resolution	Policy
PMI Members Ethics Case Procedures	Procedures
PMI Employment Guide	User Guide

5. Revision History

Changes to this policy are made as necessary under the direction of the preparers and approvers. The change log describes new topics and other changes.

Action <small>(Creation, Revision, Review)</small>	Action Date	Changes Made <small>(Detail any changes that may have been made)</small>
Creation	January 2002	Approved
Revision	December 2008	
Revision	January 2010	Updated to new template

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Action (Creation, Revision, Review)	Action Date	Changes Made (Detail any changes that may have been made)
Update	December 2020	Update PMI logo/brand, headers & footers

6. Glossary

This policy uses the following specific terms, acronyms, and abbreviations:

Term	Definition
Confidential Information	Any information, material or data that the organization considers and treats as confidential, sensitive or proprietary, and is not in the public realm through due process of PMI, as delineated on the confidentiality form, shall be defined as confidential, whether or not it is explicitly marked as such.*

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Term	Definition
<p><u>*Examples of Confidential Activities & Sources:</u> Information that is confidential, sensitive or proprietary may result from various activities and sources. These may include but are not limited to:</p> <ul style="list-style-type: none"> • Current and prospective membership and component records, including personal/business data • Employee personnel matters and actions, including personnel records with responsibilities, qualifications and compensation information as well as medical records or data that will be unduly invasive of personal privacy • Information generated by self-regulatory proceedings, such as ethics and professional conduct investigations, certification, standards-setting, accreditation or other business or governance enforcement. • Opinions and other privileged information received from inside or outside legal counsel or other learned experts, including staff • Executive or Closed Session information, including minutes and notes of any PMI sponsored group • Monthly financial statements and quarterly executive financial summaries. • Certain business and financial discussions, agreements, and financial data. This includes HQ's multi-year program plans and budgets, information about programs, projects, products and services under development as well as data generated through confidential merger or acquisition processes, or other cooperative or partnership agreements • Trade secrets or confidential commercial information generated through the corporation's business endeavors, or shared with the corporation by outside business concerns on the condition of maintenance of confidentiality <p>Programs, products, and services being developed but not yet made public.</p>	
<p>PMI Volunteer Groups</p>	<p>PMI sponsored activities, including but not limited to project teams, groups, member advisory groups, Board committees or other committees or groups formed by the Institute.</p>
<p>Group Leader</p>	<p>The individual who is responsible for the operation of the PMI Volunteer Group, as established in the applicable, PMI governing document, charter, job description or other delegation of authority by the appropriate PMI authority.</p>