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SECTION 1: POLICY STATEMENT AND PURPOSE

Individuals associated with Drury University (the “University”) must act at all times in the best interest of the University and must also act to protect the confidential nature of information regarding its activities. To that end, the University is adopting a Confidentiality Policy (the “Policy”), the terms of which are set forth below.

This Policy shall apply to:

- all members of the Board of Trustees;
- all members of University committees, task forces, and others in the University governance structure; and
- all University officers.

SECTION 2: DEFINITIONS

A. Confidential Information shall include:

1. all University information regarding an individual or corporate donor, including but not limited to, donor records, lists, addresses, assets, trusts, family data, estate or tax information, charitable giving, history, or gifts to or services provided by donors to the University;
2. all financial information concerning the University, including but not limited to, salaries paid to employees, spending policy projections, investment and similar information;
3. all plans and projections for new or developing resources of the University, including enrollment, marketing pricing strategies, program development, and fundraising techniques;
4. all information relating to the University’s resource development activities, employee lists, personnel matters, vendor relationships, trade secrets and other confidential or proprietary information;
5. all information collected, disseminated, or obtained as part of the grant review process; or
6. any of the information described in subsections 1 through 5 of Section 2 that the University obtains from another party or entity, regardless of whether such information is:
 - a. owned or was developed by the University or by a third party; or
 - b. otherwise publicly available in whole or in part.

SECTION 3: USE AND DISCLOSURE OF CONFIDENTIAL INFORMATION

A. Except to the extent that the use or disclosure of any Confidential Information is required to carry out an individual’s assigned duties, such individual will not, without prior written approval by an officer of the Board of Trustees:

1. misappropriate,
2. use for the purpose of competing with the University, either directly or indirectly,
3. disclose to any third party, either directly or indirectly, or
4. aid anyone else in disclosing to any third party, either directly or indirectly, all or any part of any Confidential Information.

SECTION 4: CONTINUED OBLIGATION OF CONFIDENTIALITY

A. Any Confidential Information which a person covered by the Policy receives during the person’s association with University shall remain the property of University and shall be returned to University

upon request, or in the case of an officer of University, upon termination of such person's employment with University. The obligations of confidentiality under this Policy are intended to survive a person's association with University.

SECTION 5: COMPLIANCE WITH LAWS

- A. Nothing in this policy shall be construed to require an individual to violate the law or order of a Court of competent jurisdiction.

SECTION 6: ENFORCEMENT

- A. A breach of this policy may be deemed a sufficient basis for sanction by the Board Officers.
 - 1. University Employees: Violation of this policy may result in disciplinary action, up to and including termination of employment.
 - 2. University Trustees: Violation of this policy may result in removal from the Board of Trustees.

SECTION 7: CHANGES TO THIS POLICY

- A. Changes to this policy require approval by the full Board of Trustees.
 - 1. Changes to this policy must be submitted to the Executive Committee of the Board of Trustees for initial approval and recommendation to the full Board of Trustees.
 - 2. Approved changes must then be incorporated into this policy and the updated policy made available to all University Trustees and University employees.