

	DOCUMENT NAME	DOCUMENT NUMBER
	CONFIDENTIALITY	

VERSION	1	
COMPILED BY		DATE 07/2025
AUTHORIZED BY		
NEXT REVISION DATE		07/2027

1. PURPOSE & SCOPE

To explain how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about patients, partners and Practice. We want to make sure that this information is well protected.

We must protect this information for two reasons. It may:

- Be legally binding (e.g. sensitive patient data.)
- Constitute the backbone of Cairnhall Private Hospital, giving us a competitive advantage (e.g. business processes.)

2. RESPONSIBILITIES

<u>Job description of person responsible</u>	<u>Duties</u>

3. PROCEDURE

This policy affects all employees, including board members, investors, contractors and volunteers, who may have access to confidential information.

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Patients/Doctors/Hospital
- Patents, formulas or new technologies
- Patient lists (existing and prospective)
- Data entrusted to our company by external parties

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- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

Employees may have various levels of authorized access to confidential information.

What employees should do:

- Lock or secure confidential information always
- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorized
- Keep confidential documents inside the practice premises unless it's absolutely necessary to move them

What employees shouldn't do:

- Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of this practice
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for the practice, they're obliged to return any confidential files and delete them from their personal devices.

Confidentiality Measures

We'll take measures to ensure that confidential information is well protected. We'll:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask employees to sign Confidentiality agreement and file in Personal File in locked office
- Ask for authorization by senior management to allow employees to access certain confidential information

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Exceptions

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests, it is part of an investigation or audit (Only Management)
- If this practice examines a venture or partnership that requires disclosing some information (within legal boundaries)

In such cases, employees involved should document their disclosure procedure and collect all needed authorizations. We're bound to avoid disclosing more information than needed.

Disciplinary Consequences

Employees who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.

We'll investigate every breach of this policy. We'll terminate any employee who willfully or regularly breach our confidentiality guidelines for personal profit. We may also have to punish any unintentional breach of this policy depending on its frequency and seriousness. We'll terminate employees who repeatedly disregard this policy, even when they do so unintentionally.

This policy is binding even after separation of employment.

4. INTERNAL SUPPORTING DOCUMENTATION

Document	Number	Retention period	Location

5. ATTACHMENT

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Receipt Acknowledgement for this SOP

I have read and been informed about the content, requirements, and expectations of this policy for this practice. I understand that if I have questions, at any time, regarding this policy, I will consult with my immediate supervisor or my Human Resources staff members. Please read the policy/procedure carefully to ensure that you understand the policy/procedure before signing this document.

Employee Signature	Employee Printed Name	DATE	Employee Signature	Employee Printed Name	DATE