

## High Hopes Therapeutic Riding, Inc. Confidentiality Policy

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The Confidentiality Policy set forth below governs the obligation of certain persons having a relationship with High Hopes Therapeutic Riding, Inc. (the “Corporation”), including without limitation employees, volunteers and independent contractors (each a “Trusted Person”), to keep confidential information learned by them from or concerning the Corporation.

**1. Duty of Confidentiality.** A Trusted Person often learns, or has access to, Confidential Information of the Corporation, which must be kept strictly confidential. For purposes of this Confidentiality Policy, “Confidential Information” includes all information developed by or for the Corporation, or concerning the Corporation, that is not otherwise publicly available, including without limitation strategic plans, proposed new programs or services, personnel information and issues, participant information and issues,<sup>1</sup> risk management, litigation, discussions at Board of Trustees (“Board”) and committee meetings, and minutes of meetings. Confidential Information may not be used for any purpose other than as contemplated and authorized by the Board, and may not be duplicated or disclosed to any outside party without proper authorization in accordance with established policies of the Corporation. In the event that any Trusted Person is served with legal process seeking disclosure of Confidential Information, he or she shall immediately notify the Executive Director of the Corporation and shall cooperate with any legal action taken by the Corporation to prevent or limit such disclosure.

**2. Participant Information.** Participant information is particularly sensitive, and its improper disclosure may cause serious harm to the participant and the Corporation. Accordingly, all participant information must be kept confidential in all contexts, such as when used during quality assessment studies, in data reporting, and in record audits. When participant information is used for professional education purposes, the identity of the individual(s) discussed must be concealed.

**3. Duration.** The foregoing duties of nondisclosure and nonuse shall apply while an individual is a Trusted Person and for a period of three (3) years thereafter or, if longer, such period as may be required by law. Any trade secrets of the Corporation shall be kept confidential indefinitely.

**4. Remedial Action.** Whenever necessary, the Board or the Executive Director shall take appropriate legal and/or administrative action with respect to a Trusted Person who discloses improperly, misuses, obtains improper access to, alters, or removes Confidential Information, or otherwise violates this Policy, including without limitation termination of the Trusted Person’s relationship with the Corporation.

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<sup>1</sup> Including without limitation all Protected Health Information as provided under the Health Insurance Portability and Accountability Act of 1996 and the regulations thereunder, as amended from time to time.

I have read and understood, and I agree to comply fully with, the Confidentiality Policy of High Hopes Therapeutic Riding, Inc.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_