



## Confidential Information

During the course of employment with Palmer College of Chiropractic (College), employees may have access to and learn about confidential, secret and proprietary documents, materials and other non-public information, in tangible and intangible form, of and relating to the College and its existing and prospective students, patients, employees, alumni, suppliers, vendors, donors and other associated third parties.

Such confidential information and the College's ability to reserve it for the exclusive knowledge and use of the College are vital to the interests and success of the College. Improper use or disclosure of confidential information might cause the College harm, including through incurring financial costs, loss of business advantage, civil damages, criminal penalties or liability under confidentiality agreements with third parties.

### SCOPE

This Confidential Information policy (Policy) applies to all employees including full time, part time, student employees, work-study, volunteers or otherwise and any other individuals who have access to the College's confidential information.

### DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings specified below:

- > The term **"College"** refers to Palmer College of Chiropractic, including operations on the Davenport campus and Florida campus.

### ADMINISTRATIVE RULES

Confidential information includes, but is not limited to non-public:

- > Alumni records
- > College designs
- > Investigations
- > Marketing strategies

- > College ideas
- > College plans
- > College processes
- > Contracts
- > Current/Prospective student information
- > Databases
- > Financial information
- > Internal controls
- > Patient information
- > Pending projects and proposals
- > Personnel records
- > Products
- > Research
- > Security procedures
- > Student records
- > Vendor information

The above list is not exhaustive. Confidential information also includes other information that is marked or otherwise identified as confidential, or that would otherwise appear to a reasonable person to be confidential in the context and circumstances in which the information is known or used.

### *Exceptions*

This Policy is not intended to discourage, interfere with, or restrict concerted activities for the purpose of collective bargaining, other mutual aid or protection, or other legally protected activity. As such, this Policy does not prohibit employees from disclosing or discussing subject matters such as their wages, benefits, performance evaluations, discipline, or other terms and conditions of employment with other employees or third parties, such as union representatives or governmental agencies concerned with workplace matters, as permitted under Section 7 of the National Labor Relations Act (NLRA).

This Policy does not prohibit disclosure of confidential information required or permitted by applicable law or regulation, or pursuant to the valid order of a court of competent jurisdiction or an authorized government agency, provided that the disclosure does not exceed the extent of disclosure required or permitted by such law, regulation or order.

### *Disclosure and Restrictions*

All confidential information is to be treated as strictly confidential and shall not be released without the prior written consent of an authorized College official acting within the limits and to

the extent of job duties. Confidential information may not be directly or indirectly disclosed, published, communicated or made available in whole or part, to any entity or person who does not have a need to know, authority to know, and intent to use the confidential information in connection with the business of the College.

Further, confidential information shall not be used for personal gain or other unauthorized purposes.

Employees are to refrain from discussing confidential information with other individuals, unless necessary in the normal course of performing assigned job duties.

Additionally, employees are subject to all applicable laws and College policies related to the retention and disclosure of confidential information.

### *Duration of Confidentiality Obligations*

Confidentiality obligations under this Policy with regard to any and all confidential information shall commence immediately upon having access to such confidential information and shall continue during and after employment until such time as such confidential information has become public knowledge other than as a result of breach of this Policy.

### *Exit Obligations*

Upon voluntary or involuntary termination of employment with the College, employees shall return to the College any and all confidential information belonging to the College and stored or maintained in any fashion. This includes any and all copies of confidential information in the possession or control of the Employee, whether provided to the Employee by the College or any of its business associates, or created by the Employee in connection with employment.

### *Investigations*

The College has a compelling interest in protecting the integrity of its investigations. In every investigation, the College strongly desires to protect witnesses from harassment, intimidation and retaliation, to keep evidence from being destroyed, to ensure that testimony is not fabricated, and to prevent a cover-up. The College may decide in some circumstances that in order to achieve these objectives, the investigation and the College's role in it must be maintained in strict confidence.

## **STANDARD INSTITUTIONAL POLICY PROVISIONS**

Institutional policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees and students to know and comply with these standards.

- > [Standard Provisions Applicable to All Institutional Policies](#)

## **Additional Information**

### **ASSOCIATED POLICIES, PROCESSES AND/OR PROCEDURES**

This Policy is supplemented below. It is the responsibility of all employees and students to know and comply with policies and procedures as supplemented.

#### **POLICIES**

- > N/A

#### **PROCESSES AND/OR PROCEDURES**

- > N/A

#### **FORMS/INSTRUCTIONS**

- > N/A

#### **CONTACTS**

- > Human Resources  
1000 Brady Street  
Davenport, IA 52803  
(563) 884-5258  
[hr.dept.ia@palmer.edu](mailto:hr.dept.ia@palmer.edu)

#### **RELATED INFORMATION**

- > N/A

**HISTORY**

Adopted:..... March 7, 2016

Responsible Officer:.....Jennifer Randazzo, M.A.S., C.P.A.  
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