



CENTENNIAL BERMUDA FOUNDATION (“Centennial”) CONFIDENTIALITY POLICY

V5 – 30th November 2020

Purpose

The purpose of this Confidentiality Policy is to document the process that is to be followed by Centennial’s Directors, employees, agents, consultants and/or members of Committees of Centennial (collectively, **“the Recipients”**), to ensure that confidential information concerning Centennial or received by Centennial is handled, maintained and disposed of in a secure, respectful and appropriate manner.

What is Confidential Information?

Centennial defines confidential information as all information (in any form) that Centennial deliberates upon, produces or receives that is not generally available to the public including without limitation:

- (i) the business affairs, reports, strategic plans and records of Centennial;
- (ii) deliberations and minutes of Centennial’s Board;
- (iii) Centennial’s proprietary information;
- (iv) scholarship and grant applications, and communications with or from applicants and recipients of scholarships and grants;
- (v) deliberations and minutes of Centennial’s committees; and
- (vi) any information that Centennial receives where the provider has stated that the information is confidential or where a reasonable person would conclude that the information received is confidential.

What is Not Confidential Information?

Confidential Information does not include:

- (i) information which is already in the public domain;
- (ii) property of Centennial or information belonging to Centennial which it decides to release into the public domain; and
- (iii) information that was given to Centennial by a provider who was either on notice that Centennial reserved the right to publicize the information or parts of it, or gave written consent to the publication.

Policy Requirements

Recipients are required to maintain strict confidentiality with regard to any and all matters of a confidential nature. All information acquired during their relationship with Centennial or following termination of the relationship (for whatever reasons) shall not be disclosed to any third party or used for their own benefit or any third party’s benefit, including their relatives, friends, business and professional associates, without the prior written consent of the Chairman or Deputy Chair of the Board of Centennial save and unless the use or release of the confidential information is in the

ordinary course of Centennial's business. Where the confidential information belongs to a third party, written consent will not be given unless the third party has approved in writing the intended use. Should a Recipient be by law required to make a disclosure of information they shall, so far as lawful, promptly inform the Chair or Deputy Chair of the Board of Centennial of such a requirement.

The Board of Centennial at its next scheduled meeting shall be informed of all requests made for the release or use of confidential information and any written consents that may have been given.

Recipients are required to:

- (i) Keep the confidential information secure and limit access to persons authorised by Centennial to receive same;
- (ii) ensure that confidential information is not retained any longer than is operationally necessary or necessitated by good business practices;
- (iii) ensure that the confidential information is destroyed when retention is no longer required and;
- (iv) undertake to deliver up the confidential information to Centennial when their relationship with Centennial comes to an end.

Recipients must exercise particular care to maintain confidentiality if approached by journalists or other representatives of the media and when using social media platforms. All queries from the media should be referred to the Chair of Centennial's Communications Committee, the Managing Director or the Secretary of Centennial.

The Recipients are required to make an annual declaration confirming that they will or as the case may be, have adhered to the terms of this policy if so requested by Centennial.

Scholarship and Grant Applications

As a condition of receiving a scholarship or grant from Centennial, Centennial reserves the right to publish the fact that a particular person or organisation is the recipient of funding, the amount of the funding received and the purpose of the funding. Centennial will not publish the names of persons or organisations whose applications were not granted.