

RESPONSIBLE DEPARTMENT: Human Resources	POLICY DESCRIPTION: Confidentiality & Proprietary Information
PAGE: 1 of 2	REPLACES POLICY DATED:
APPROVED: 04/15/2013	RETIRED:
EFFECTIVE DATE: 12/1/2013	REFERENCE NUMBER: HR.004

<p>SCOPE:</p> <p>This policy applies to UP Health System - Portage and its affiliates with employees who provide services in UP Health System - Portage's primary and secondary service area (the "Company"). References to Facility or Facilities throughout the policy are meant to include the Hospital and/or its affiliates with employees providing services in UP Health System - Portage's primary and secondary service area.</p>
<p>PURPOSE:</p> <p>To establish a policy that protects the Company from the unauthorized dissemination of proprietary and confidential information.</p>
<p>POLICY:</p> <p>A. All employees will be required to sign a Confidentiality Statement at the time of hire as part of their new hire paperwork process.</p> <p>B. From time to time employees may have access to confidential information involving Company operations such as patient information, business data, and news stories prior to their release date. Unauthorized disclosure of confidential information is detrimental to the Company and no time should an employee knowingly discuss such information. Confidential information must be kept confidential. Failure to maintain confidential information may result in an employee's discipline, up to and including termination.</p> <p>C. While employed with the Company, employees may have access to and become acquainted with information of a proprietary or secret nature. This information is or may be applicable or related to the Company's present and future business, research or development. Trade secret information includes, but is not limited to, devices, secret inventions, processes, compilations of information, records, specifications, and information concerning vendors or patients. Employees shall not disclose any Company trade secrets directly or indirectly, use them in any way, either during the term of their employment or any time thereafter, except as required in the course of Company employment.</p> <p>D. All information concerning a present or former patient's care, treatment, diagnosis, prognosis and personal affairs is strictly confidential and is to be discussed or disclosed only by authorized personnel on a need-to-know basis. "Patient" also includes Company employees when they are patients at the hospital.</p> <p>Whether information concerning the patient is obtained during the course of one's regular</p>

All references to "UP Health System - Portage," the "Facility" or the "Company" used in this policy refer to one or all of UP Health System - Portage and/or its affiliates with employees who provide services in Portage Health's primary and secondary service area.

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duties or accidentally overheard while performing work, employees must refrain from discussing such information with unauthorized persons, in or out of the hospital, in order to ensure the patient's right to privacy.

Violation of employee/patient confidentiality is grounds for discipline, up to and including termination.

Nothing in this policy is intended to restrict whatever rights you may have under Federal, State or local laws.

REFERENCES:

HIPAA Program Policy
Code of Conduct
LPNT.IS.SEC.005 - Confidentiality and Security Agreements Policy

FORMS

IS Confidentiality and Security Agreement Form
HIPAA Program Acknowledgement Form
Code of Conduct Acknowledgement Form