

MUAY THAI ONTARIO

Confidentiality Policy

POLICY DOCUMENT

June 2026

Document Control

Policy Owner: Muay Thai Ontario Board of Directors

Effective Date: June 2026

Related Documents: MTO Privacy Policy, MTO Discipline Policy, MTO Board & Officer Governance Manual

1. Purpose

This Confidentiality Policy sets out how Muay Thai Ontario (MTO) identifies, handles, and protects confidential information that is not necessarily personal information governed by MTO's Privacy Policy.

MTO's Privacy Policy addresses the collection, use, and disclosure of personal information about individuals, in keeping with applicable privacy law. This Confidentiality Policy addresses a broader category of sensitive information (including board discussions, disciplinary matters, financial details, and strategic or competitive information) that must be protected regardless of whether it constitutes personal information.

2. Scope

This policy applies to all directors, officers, employees, volunteers, committee members, and contractors of MTO who, in the course of their role, have access to confidential information belonging to or held by MTO.

3. What Is Considered Confidential Information

Confidential information includes, but is not limited to:

- Board and committee discussions, deliberations, and meeting minutes not yet approved or formally released to members
- Information shared during a disciplinary or dispute resolution process under MTO's Discipline Policy or Dispute Resolution Policy
- Personal information about members, athletes, coaches, or officials, as further described in MTO's Privacy Policy

- Financial information, including budgets, financial statements prior to formal approval, banking details, and donor or sponsor information
- Legal advice and correspondence with MTO's legal counsel
- Strategic plans, partnership negotiations, and competitive or sensitive operational information
- Any information explicitly designated as confidential by the Board or by MTO policy

4. Obligations of Directors, Officers, and Volunteers

Individuals with access to confidential information must:

- Maintain the confidentiality of all information described in Section 3, both during and after their term of service with MTO
- Use confidential information only for the purpose for which it was shared, and only to the extent necessary to fulfill their role
- Not disclose confidential information to any third party, including other members, the media, or the public, without proper authorization from the Board
- Take reasonable steps to securely store and transmit confidential information (e.g., using secure file storage, avoiding unsecured email for highly sensitive matters, and not discussing confidential matters in public or unsecured settings)
- Promptly report any suspected unauthorized disclosure or breach of confidential information to the Chair or Secretary

This Obligation Continues After Service Ends

Confidentiality obligations under this policy do not end when a director, officer, or volunteer's term ends. Former board members and volunteers remain bound by this policy with respect to confidential information they accessed during their time with MTO.

5. Board-Level Confidentiality

In addition to the general obligations above, directors and officers are subject to the following board-specific confidentiality expectations, consistent with MTO's Board & Officer Governance Manual:

- Discussions at board meetings, including differing views expressed during deliberation, are confidential and should not be shared outside the boardroom, even after a decision has been made.
- Once a board decision is made, directors and officers are expected to publicly support that decision, even if they personally voted against it, while keeping the substance of the debate confidential.
- Draft minutes, financial statements, and other board materials remain confidential until formally approved and, where applicable, released to the membership.

6. Conflicts of Interest and Confidentiality

Where a director or officer has declared a conflict of interest under Section 11 or Section 15 of MTO's Corporate By-Laws, that individual must not access, retain, or use confidential information related to the matter giving rise to the conflict, beyond what is necessary to make the required disclosure.

7. Permitted Disclosures

Confidential information may be disclosed without a breach of this policy where:

- Disclosure is required by law, court order, or a regulatory body with lawful authority to request the information
- Disclosure is necessary to comply with MTO's obligations to its insurer, auditor, or legal counsel
- The Board has expressly authorized the disclosure
- The information has already been made public through proper channels (e.g., approved minutes released to members, published financial statements)

8. Confidential Information in Disciplinary and Dispute Matters

Information shared or generated during a disciplinary process under MTO's Discipline Policy, or a dispute resolution process under MTO's Dispute Resolution Policy, is confidential and will only be shared with those individuals who need access to carry out the relevant process. This includes:

- The identity of individuals involved in a complaint or disciplinary matter
- The substance of allegations, evidence, and submissions made during the process
- The Board's deliberations and reasoning in reaching a decision

Final decisions may be communicated to the parties involved and, where necessary for safety or governance reasons, to relevant MTO staff or volunteers on a need-to-know basis, consistent with this policy.

9. Breach of This Policy

A breach of this Confidentiality Policy by a director, officer, employee, volunteer, or contractor may result in disciplinary action in accordance with MTO's Discipline Policy, up to and including removal from a board, committee, or volunteer position.

10. Relationship to Other MTO Policies

Related Policy	How It Connects
MTO Privacy Policy	Governs the collection, use, and disclosure of personal information specifically; this policy addresses the broader category of confidential organizational information.
MTO Discipline Policy	Sets out the disciplinary process; this policy governs how information arising from that process is protected.
MTO Dispute Resolution Policy	Sets out the dispute resolution process; this policy governs how related information is protected.

MTO Board & Officer Governance Manual	Describes board-level confidentiality expectations in the context of director duties and conduct.
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11. Policy Review

This policy will be reviewed at least every two years by the MTO Board of Directors, or sooner if required by changes to applicable privacy law, ONCA, or the Sport Recognition Policy.