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1. Procedures

CI Compass seeks to balance two principles:

1. CI Compass handles the management and distribution of confidential data and information such that Major Facilities (Collaborators) with which CI Compass engages are comfortable sharing such data with CI Compass during the course of collaborations, engagements, etc.
2. CI Compass seeks to share information broadly with the community to facilitate learning from common experiences.

CI Compass and its Collaborators will have open, frank discussions around any concerns regarding cyberinfrastructure issues, including the classification and marking of information, reports, discussions, architecture and design documents, and any other engagement products, considered appropriate only for limited distribution. CI Compass and its Collaborators will maintain confidentiality of discussions and shared outcomes of the engagement. Any wider release of an engagement product will require approval from the Collaborator engagee/lead and CI Compass Executive Committee.

To that end, this policy document defines how CI Compass distinguishes and manages confidential data from data it can broadly disseminate.

1.1 Handling Collaborator Information

CI Compass will apply the following practices to handling Collaborator information unless otherwise agreed (for example, in an Engagement Plan):

1. All Engagement Plans (or other planning documents) should explicitly call out what resulting products will be public. The goal is to make as many products public as possible to foster broad impact from the engagement.
2. Any data, documents, communications, etc. that a Collaborator with CI Compass wishes to remain confidential shall be marked or otherwise clearly indicated as “confidential” by the Collaborator.

3. CI Compass staff handling confidential data should ensure it is labeled by the [CI Compass Data Labeling Policy](#) as either ' **Internal Use Only** ', ' **Release to <appropriate party>** ' or ' **Release to <appropriate party> after <date>** ' as appropriate.
4. CI Compass team members must ensure they do not share confidential information outside of CI Compass.
5. CI Compass team members may not use confidential data for research and other purposes not related to CI Compass without explicit permission of the relevant engagee.
6. CI Compass makes an effort to select usable communication channels appropriate to the sensitivity of the content of those communications. CI Compass uses Google Drive to store documents related to engagements as well as other CI Compass functions. CI Compass requires that staff accounts used to access CI Compass engagement documents use a strong, unique password and use Google 2-step verification. By default, all active CI Compass personnel who have complied with these requirements have access to engagement documents.

1.2 Exceptions to this policy

CI Compass is committed to confidentiality with collaborators, however the collaborators should be aware of the limits of what CI Compass can guarantee.

1. CI Compass is a virtual organization comprising a number of institutions. CI Compass will share information when required by law as determined by one of their institutional general counsel's offices.
2. Collaborator information will be shared within the CI Compass project for internal business purposes such as quality control, reporting, and conflict-of-interest management.
3. The fact that CI Compass is collaborating with a Major Facility and a high-level description of that collaboration will be reported to the National Science Foundation and publicly disseminated.
4. Collaborator Information will be shared with cognizant NSF Program Officers if a request explicitly comes from the NSF.

When CI Compass is required to share collaborator information outside of CI Compass, it will do its best to minimize that sharing and inform the relevant parties.

2. Scope: Defining “Collaborator Information”

Collaborator information is any information received from a member of CI Compass's community, or information derived from such information. Examples include:

1. Information received during an engagement. For example, during discovery or during conversations;
2. Reports and other products created by CI Compass and the engagee during an engagement;
3. Information received by CI Compass about proposals being written by community members, often in the form of queries in regards to CI Compass's participation.
4. Non-public source code and any undisclosed (to the public) weaknesses discovered by CI Compass in software or Collaborators' systems' architecture.

3. Policy Description

In the course of its activities, particularly, but not only, Engagements, CI Compass will obtain or develop information about other projects, which these projects consider sensitive and confidential between CI Compass and themselves. This policy defines “Collaborator Information” and documents CI Compass's principles in handling such information.

4. Reasons for this Policy

This policy exists to ensure uniform handling of collaborator information across the CI Compass project and to provide assurances and details to CI Compass Collaborators on how CI Compass will handle their information.

5. Change Log

Date	Description of Change	Version Number
11/09/2021	Initial version (based on a relevant Trusted CI policy)	V1