

# **Mt. Pleasant Area**

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## community foundation<sup>SM</sup>

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### **Confidentiality Policy**

The Mt. Pleasant Area Community Foundation maintains and manages a great deal of information that must be kept confidential. This includes information about donors, prospective donors, grantees, prospective grantees, wealth advisors and their firms. The effective functioning of the Community Foundation also requires respecting the confidentiality of discussions that take place and information that is shared in the course of conducting Community Foundation business.

The Community Foundation's Board of Trustees has adopted this Confidentiality Policy to assist trustees, committee members, employees, consultants, contractors, interns and volunteers in fulfilling their confidentiality obligations and commitments. While the policy addresses some common confidentiality concerns, it is not an exhaustive list of all situations where a confidentiality obligation may arise. Questions about whether information is confidential or about situations in which confidential information may be released or discussed should be directed to the CEO/COO. As used in this policy, the term "personnel" includes the Community Foundation's trustees, committee members, employees, consultants/contractors, interns and volunteers.

**General Rule:** Information in the possession of the Community Foundation and discussions of Community Foundation business should generally be presumed to be confidential. All Community Foundation personnel at every level are responsible for maintaining confidentiality.

**Confidentiality of Donor Information:** Except as required by law, the Community Foundation will not disclose information about a donor or a donor's gift. However, unless otherwise requested by the donor, the Community Foundation may publish the names of individual donors in the Foundation's Annual Report and other reported listings. In the case of memorial gifts, the Community Foundation will provide the names of donors to members of the immediate family unless the donor has requested anonymity. The Community Foundation will not disclose the amount of any gift without the donor's consent. The Community Foundation may accept anonymous gifts on a case by case basis.

**Confidentiality with respect to Grant Applicants and Grantees:** The Community Foundation will not disclose the identity of grant applicants except as necessary to process the application and will protect financial and personal information. This includes information provided by applicants for grants to individuals such as scholarships. The Foundation will generally disclose the identity of grantees and the amount awarded.

**Confidentiality of Community Foundation Business:** Except as authorized by the Community Foundation's Board, or by the appropriate committee, discussions and records of the Community Foundation's operations are not to be disclosed. This includes information about

the Community Foundation’s financial operations, fundraising, investments, personnel, grantmaking, and contractual relationships. The positions of individual trustees, committee members, employees, consultants, contractors, interns and volunteers should not be discussed, even within the Community Foundation, except in the course of official Community Foundation meetings and processes where those subjects are discussed.

**Exceptions:** This policy does not apply to disclosures to attorneys, accountants and other professionals providing assistance to the Community Foundation. It also does not apply to disclosures to tax authorities, government agencies, courts, or as otherwise required by law. The following are considered public documents and information contained in them is not subject to the confidentiality requirements of this policy:

- The Community Foundation’s annual financial statements once they have been accepted by the Board.
- The Community Foundation’s IRS 990 as required to be publicly disclosed. This does not include the names and addresses of donors listed in Schedule B, as that information is not required to be disclosed.
- The Community Foundation’s Investment and Spending Policy.

**Protection of Confidential Information:** Community Foundation personnel who have executed a copy of this policy may access confidential information necessary to the performance of their functions. Community Foundation personnel are expected to exercise sound judgment in securing information taken outside the Community Foundation’s offices or copied from its network. Any information so removed should be returned as soon as possible and deleted from laptops or other personal devices.

**Penalties:** Penalties for violating this policy can include sanction or termination of trustees, committee members, employees, consultants, contractors, interns and volunteers.

**Procedures:** Annually, trustees, committee members, employees, consultants, contractors, interns and volunteers will review and agree to comply with the Confidentiality Policy. Signed copies will be kept on file.

**I have read the Confidentiality Policy and agree to comply with it.**

\_\_\_\_\_  
**Printed Name**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Signature**

I am a: \_\_\_\_\_ **Trustee**      \_\_\_\_\_ **Committee Member**      \_\_\_\_\_ **Employee**  
          \_\_\_\_\_ **Consultant/Contractor**      \_\_\_\_\_ **Intern**      \_\_\_\_\_ **Volunteer**