



## Confidentiality Policy

The Community Foundation of Northeast Iowa (hereinafter referred to as the “Foundation”) maintains and manages information that must be kept confidential. This includes information about donors, prospective donors, grantees, prospective grantees, employees, and professional advisors. In order for the Foundation to effectively function, it must require confidentiality of discussions that take place and information that is shared in the course of conducting Foundation business.

The Foundation’s Board of Directors (hereinafter referred to as the “Board”) has adopted this Confidentiality Policy to assist the Foundation’s Board, officers, committee members, employees, contractors, fiduciaries 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 Foundation’s President/CEO. As used in this policy, the term “Agent” includes the Foundation’s Board, committee members, employees, contractors, fiduciaries and volunteers.

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

**Children’s Online Privacy Protection Rule (COPPA):** The Foundation does not obtain information from minors, as defined under the COPPA. This rule defines minors as children under 13 years of age.

**Confidentiality of Donor Information:** Except as required by law, the Foundation will not disclose information about a donor or a donor’s gift with anyone outside of advisors to the fund a gift is directed to. However, unless otherwise requested by the donor, the 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 Foundation may provide donor information to members of the immediate family unless the donor has requested anonymity. The Foundation will not disclose the amount of any gift with anyone outside of advisors to the fund a gift is directed to without the donor’s consent. The Foundation may accept anonymous gifts to it on a case-by-case basis.

**Confidentiality with respect to Grant Applicants and Grantees:** The Foundation will not disclose the identity of grant applicants except as necessary to process the application and will protect financial and personal information that applicants submit to it. This includes information provided by applicants for grants to individuals such as scholarships and hardship assistance. Basic information about grantees is disclosed as outlined in the grant agreements with the grantees.

**Confidentiality of Foundation Business:** Except as authorized by the Board, discussions and records of the Foundation’s operations are generally not to be disclosed. This includes information about the Foundation’s financial operations, fundraising, investments, personnel, grantmaking, and contractual relationships. The positions of individual Board members, committee members, employees, contractors, fiduciaries and volunteers should not be discussed, even within the Foundation, except in the course of official 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 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 Foundation’s annual report or financial review once it has been accepted by the Board.
- The Foundation’s Form 990 as required to be publicly disclosed. This does not include the names and addresses of donors as that information is not required to be disclosed.
- The Foundation’s Investment and Spending policies

**Protection of Confidential Information:** Foundation personnel who have executed a copy of this policy may access confidential information necessary to the performance of their functions. Foundation personnel are expected to exercise sound judgment in securing information taken outside the 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 termination of employees, contractor agreements, and removal of Board and committee members.

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

Name

Date

Type of Agent

E-mail