

Community Foundation of St. Clair County Confidentiality Policy

Confidentiality of Records

The Community Foundation of St. Clair County recognizes that the operation of the Foundation requires the maintenance and management of extensive records. This includes information about donors, prospective donors, grantees, prospective grantees, students and wealth advisors and their firms. All information in the possession of the Foundation and discussions of Foundation business should generally be presumed to be confidential. The board of directors, staff, committee members and volunteers are responsible for maintaining confidentiality of Foundation business.

The President & CEO shall be responsible for maintaining the confidentiality of donors, prospective donors, and grantee records. The President & CEO may, in their discretion, make all or part of any record available to staff, volunteers and board members to assist them in executing their responsibilities. Any such review of records shall respect the Foundation's significant interest in protecting the sensitive nature of donor and grantee names and information.

Donor Privacy Policy

The Foundation takes donor confidentiality very seriously. We do not sell, rent, or exchange lists of names to any individual or organization for any purpose, nor do we share donor names or contact information externally without your permission. We have the following two categories of privacy:

Anonymous

As an anonymous donor your name will generally not be shared with board members, other fund advisors or the public beyond essential staff members. However, your name may appear on internal reports or event lists shared with limited staff members. For any grant recommendation from a donor-advised fund, you can decide whether or not to be anonymous to the grantee organization.

Anonymous donor names for gifts over \$1 million will be disclosed to the Board Chair by either the Foundation President or Vice President. The Board Chair will then decide if there are any unusual circumstances that warrant disclosure to other officers or the full board. Additionally, a "super-majority" vote of the Board (70%+) by those present at a regularly scheduled board meeting, shall compel the Foundation President, Vice President or Board Chair to disclose the names of anonymous donors over the \$1 million level.

Not anonymous

If you decide not to be anonymous, your name and fund name may be shared with staff or board members when a new fund is set up. Your name and fund name could be listed in our annual report or on our website, but no gift amounts would be referenced. If you give to a fund with existing fund advisors, your name and gift amount will appear on their fund statement. For any grant recommendation from a donor-advised fund, you can decide whether or not to be anonymous to the grantee organization.

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 however these documents do not include the names and addresses of donors as that information is not required to be disclosed.

- 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.

Penalties

Penalties for violating this policy can include termination of employment and removal of board members. 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.

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

Your Printed Name: _____

Signed Name: _____

Affiliation: _____

Today's Date: _____

1/14/2025