

Community Foundation of Southern Wisconsin, Inc. Confidentiality Policy

The Community Foundation of Southern Wisconsin's role in our geographic service area results in the acquisition of certain information that is considered confidential. The Board of Directors, employees, volunteers, and consultants must balance transparency and confidentiality in order to uphold the Foundation's reputation for trust and integrity and to instill public confidence in its ability to steward assets. For that purpose, the Foundation subscribes to this policy on confidentiality.

Except when engaged in the conduct of proper business of the Community Foundation of Southern Wisconsin, Inc., members of the Board of Directors, employees, volunteers and consultants shall not disclose to third parties confidential information regarding Foundation matters.

By a majority vote, the Board of Directors may authorize disclosure of any information otherwise deemed confidential.

Confidentiality

All information that is not generally known or available to the public, or not otherwise authorized for disclosure by the Board of Directors shall be considered confidential. Confidential information includes, but is not limited to:

- The positions or statements of individual board members, committee members or staff expressed during official Foundation meetings.
- Content of Foundation business materials, including documents, reports, data, minutes or analysis of these materials performed by the Foundation. This includes information regarding donor, gifts, potential donors/gifts, pending grants, contracts and agreements entered into by the Foundation, policies and processes of the Foundation, financial information and business records of the Foundation and other relevant data.
- All information received or created as part of the grant-making process and all discussion that takes place as part of the grant-making process.

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 Executive Director.

Confidential Information:

The Foundation is responsible for maintaining the confidentiality of donor and prospect records, as well as fund information. 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.

Donor Information:

- *Advisors of Donor Advised Funds* (fund holders) may obtain or view information pertaining to their own funds, including donation amounts from donors contributing to their funds, unless the donor requests anonymity.
- The Foundation may share information with donors pertaining to their own gifts.
- *Agency/Organizational Funds*: In addition to quarterly fund activity reports, an approved fund representative may obtain or view information pertaining to the fund including donation amounts and contact information, unless the donor requests anonymity.
- *Community Funds and EIE Funds*: volunteer advisory boards will receive a monthly fund activity report without gifts amounts. Advisory boards may obtain detailed gift information upon request, unless the donor requests anonymity. Such documents are marked 'confidential'.
- Approved fund representatives of other voluntary advisory boards may obtain information pertaining to the funds they advise, including contact information and gift amounts, unless the donor requests anonymity.
- On occasion, specific gift amounts may be disclosed to an authorized representative who is coordinating a fund raising campaign for a specific component fund. Such documents are marked 'confidential'.
- If giving categories have been stipulated for a specific fund, challenge grant or project, or capital campaign, then the donors, unless they otherwise specify, are deemed to have given permission for the Foundation to disclose their names associated with the particular giving category.
- The Foundation shall not release to third parties or allow third parties to copy, inspect, or otherwise use the Foundation's records or other information pertaining to the identification of a donor or a donor's gift. No disclosure to third parties of such information, including addresses and demographic information shall be made without the donor's consent.
- When specifically requested by the donor, the Foundation may provide the name and address to third parties.
- In the case of memorial and honorarium gifts, providing contact information is submitted, the Foundation shall provide the names of donors to members of the immediate family/or honoree unless the donor has requested anonymity. The Foundation will not disclose the amount of any gift without the donor's consent.
- Unless otherwise specified in the document, donors making gifts to the foundation by bequest or other testamentary device are deemed to have granted permission to disclose their names.
- Unless otherwise requested by the donor, names of all donors may be published in CFSW's annual report and/or other publications. CFSW may publish donor names by giving categories, but will not publish gift detail.

With respect to Grant Applicants and Grantees: The Foundation will not disclose the identity of scholarship or grant applicants except as necessary to process the application and will protect financial and personal information that applicants submit. Any copies of confidential information shall not be held outside the Foundation office for extended periods and are to be destroyed as soon as possible.

The Foundation may disclose the identity of scholarship recipients and grantees and the amounts.

Public Disclosure: 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 audit once the board has accepted it.
- The Foundation’s internal revenue tax forms.
- Information about the Foundation’s investment allocation and performance.

Protection of Confidential Information: Board members, advisory board members, committee members, volunteers, staff and consultants must sign a copy of this policy, acknowledging their understanding of the confidentiality policy, and agree to refrain from disclosure of confidential information even after termination of service, employment or separation. CFSW personnel are expected to exercise sound judgment in securing information taken outside the Foundation’s offices or copied from its network. Foundation personnel should refer to the CFSW IT Security Policy for full disclosure information.

Penalties: Penalties for violating this policy may include disciplinary action, up to and including dismissal of employee or contractor, and/or removal of volunteer or board member from any committee.

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

Signature **Printed name**

Date: _____

I am a: ___ **Board Member**, ___ **Employee**, ___ **Volunteer**, ___ **Consultant/Contractor**

Board approved:

June 20th, 2017