

Approved 8/18/15

Community Foundation of St. Clair County
Confidentiality Policy

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

The Foundation's Board has adopted this Policy on Confidentiality to assist the Foundation's directors, officers, employees, agents, 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, Vice President, Director of Finance, or the Board Chair, who will consult with the Foundation's Legal Advisory Committee/Attorneys as deemed necessary. As used in this Policy, the term "Foundation personnel" includes the Foundation's directors and officers, employees, agents, fiduciaries, and as appropriate, volunteers and consultants.

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

Confidentiality of Donor Information: The Foundation recognizes the paramount role of donors and their gifts to the Foundation in executing its charitable mission. The Foundation recognizes that donors reserve the freedom to determine the degree and type of recognition they prefer and the Foundation respects the confidentiality of donors who do not wish to be publicly recognized. In carrying out the Foundation's development program, staff will recognize and acknowledge donors in appropriate ways, both publicly and privately, subject to the donor's wishes and to the degree allowed by law.

Unless otherwise requested by the donor, the Foundation may publish the names of donors in the Foundation's Annual Report and other reported listings. In the case of memorial gifts, the Foundation may also provide the names of donors to members of the immediate family for acknowledgement unless the donor has requested anonymity. The Foundation will not disclose the amount of any gift without the donor's consent.

Confidentiality with respect to Grant Applicants and Grantees:

Generally, the Foundation will not disclose the identity, financial or personal details of grant applicants except as necessary to process the applications. This includes individual applicants (as in the case of scholarship awards). The Foundation will disclose grantee names, award amounts and grant purposes through Foundation reports and other communications and awareness efforts.

Confidentiality of Foundation Business: The Foundation views accountability, transparency and credibility as critical factors in its past, present and future success, and we strive to demonstrate these characteristics to all stakeholders including our Board and committees, donors, grantees and the general public, using available technology to assist with this. We make all our policies and governing documents available on our website ---www.stclairfoundation.org---along with audited financial statements and IRS Form 990s.

The Foundation recognizes that its Board and Committee members will be asked about the Foundation through other interactions in their lives, and effort is taken to ensure they have good information and a working knowledge to respond. When matters of a confidential nature arise, including situations when employment or other laws are involved or when there is specific timing over information release to the public, the need for confidentiality is expressly reinforced and communicated to Board and Committee members and staff.

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
- Any other documents the Foundation routinely discloses except for reports and information created by others and deemed proprietary to the creator (such as reports on investment performance reports).

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 sanction or termination of employees and removal of board members.

The following acknowledgement will be collected from stipulated individuals and maintained on file.

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

Printed Name	Signature	Date
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I am a: Board Member Staff Member Volunteer

Consultant/Contractor (Optional)