

# DONOR PRIVACY, INFORMATION PROTECTION AND SECURITY POLICY

# **Purpose**

The Community Colleges of Spokane Foundation is committed to upholding donor trust. We adhere to the Donor Bill of Rights, established by the Association of Fundraising Professionals and other leading fundraising organizations, which includes the right of a donor to be assured that information about a donation is handled with respect and confidentiality. A copy of the Donor Bill of Rights and the Donor Privacy, Protection and Information Security Policy is available at <a href="https://www.ccsfoundation.org">www.ccsfoundation.org</a>.

# **Donor Privacy**

The Foundation has developed this policy to ensure that donor information is not shared with a third party absent authorization. This policy applies to the collection of information - including information collected on our website. By submitting information to us or any of our staff, a donor agrees to the terms and conditions of the policy and to our processing personal information for the purposes stated below.

# Personal Information

Personal information is information that identifies a donor personally - such as name, address, telephone number and email. We collect and store the personally identifiable information provided to us.

#### Use and Disclosure of Personal Information

It is our intention to use and disclose personal information only for the following internal development purposes of the Foundation: to complete a transaction, communicate with a donor, acknowledge and recognize contributions, update donors on activities and events and conduct ongoing development efforts. Specifically:

- We will not share personal information with any third party without express consent, except as specified below.
- We will never sell or trade personal information.
- We will not send mailings on behalf of other organizations.
- We will collect payment information, billing address and other information necessary to process donations or event registrations.
- We may share personal information internally with specific members of the Board of Directors, volunteers or Foundation staff for the purpose of resource development.
   Information shared may include giving history as well as other information necessary to develop a strategy of cultivation, solicitation and stewardship. Information will only be

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- shared on an as needed basis and only after the Director, staff or volunteer has signed a Confidentiality Agreement.
- Unless a donor requests to remain anonymous, the Foundation may acknowledge any donation by name and/or description of donation (including the level of monetary support). The Foundation will provide a means for a donor to indicate a desire for anonymity at least annually. Donors may also inform the Foundation of such a request by email or mail communication to the Executive Director (see contact information below).
- The Foundation will use donor information to comply with the law or in the good faith belief that such action is necessary to conform to the requirements of the law or to comply with legal process served on us, protect and defend our rights or act in urgent circumstances to protect the personal safety of others.
- Donors have the right to review information that the Foundation has collected about them. To review that information please contact us as shown below.

# **Information Protection and Security**

The Community Colleges of Spokane Foundation will provide a secure environment for collecting donations and will maintain internal controls governing the safekeeping of all confidential donor financial and personal information.

Donor information is maintained in a cloud-based database and in paper files. This information is kept secure through the following actions:

- The database is password protected. Only authorized Foundation staff and volunteers have access to the database. Each user has a distinct user name and password. The database is located on a cloud-based server maintained with protection by the database company.
- Paper files are kept in a locked filing cabinet on site. Only authorized staff have access to the filing cabinet.
- Credit card information is used and retained only in order to process contributions. After the gift is processed, credit card numbers are not retained on-site physically or electronically.
  - o All envelopes and gift forms are held in a safe until processed. After processing, all credit card information is shredded.
  - All credit card information processed electronically is coded upon entry into the system and is unable to be seen by the Foundation.
- The Foundation accepts online donations through Blackbaud or other secure online transaction processors, all of which use secure technology to accept online credit card donations. The Foundation cannot absolutely guarantee that credit card data handled by a third party processor will be secure and is not liable for information a donor shares with others.
- All gifts provided by donors who wish to remain anonymous are entered in the system with Anonymous marked as the recognition name.

# **Contact Information**

Donors with questions about this policy or wishing to opt out of being acknowledged publicly should contact:

**Executive Director** Community Colleges of Spokane Foundation PO Box 6000 501 N Riverpoint Boulevard, Suite 203 Spokane, Washington 99217

The foregoing Donor Privacy, Information Protection and Security Policy was adopted by the Board of Directors of the Community Colleges of Spokane Foundation by consent.

Approved By The Board Of Directors on: