

The nature of the Madison Community Foundation's role in the community results in the acquisition of certain information that is considered confidential. Much information is shared with the Foundation because of its reputation for trust and integrity. In order to safeguard the Foundation's reputation as a responsible decision-maker, to protect its capacity to gather data necessary to make those decisions, to engender confidence in its ability to steward charitable assets and to enable the Foundation to responsibly carry out its important duties in the community, the Foundation subscribes to the policy on confidentiality and donor privacy presented below.

Confidentiality

The Madison Community Foundation (MCF) Board of Governors, volunteers and staff shall not engage in private discussion of, or otherwise disclose to third parties, information regarding Foundation matters, except when engaged in the conduct of the proper business of the Foundation. All information that is not a matter of public record, or not otherwise authorized by an appropriate authority for disclosure (i.e. the Board, a Board committee, Board Chair or President), shall be considered confidential. Care must be taken to preserve confidentiality of discussions that take place and information that is shared in the course of conducting MCF business. Furthermore, and not in limitation of this policy, the following shall apply:

- The positions or statements of individual Board members, Committee members or Staff shall not be discussed outside of official Foundation meetings and processes. Likewise, the decisions of the Board or Staff shall not be disclosed without appropriate authorization.
- Content of Foundation business materials, including documents, reports, records, data, minutes or analyses of these materials performed by the Foundation shall not be discussed or shared outside of official meetings and processes. This includes information regarding donors, donations, potential donations, 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. Information regarding the Foundation's investment allocation and performance will be routinely published.
- All of the materials provided to a Board member, Committee member or Staff member about an organization as part of the grant-making process and all discussion that takes place as part of the grant-making process, whether an internal individual conversation or a discussion at a committee meeting, is confidential.
- An individual with questions about what is or is not appropriate to discuss outside of the Foundation, or who wishes to seek permission to make a public disclosure of information that is otherwise confidential, should speak with the President.

Additionally, all Board members, Committee members, volunteers and Staff must sign an agreement acknowledging their understanding of the confidentiality policy, including their agreement to refrain

from disclosure of confidential information even after termination of service, employment or separation. Penalties for violating these confidentiality policies can include sanction or termination of staff and removal of board and committee members.

Donor Privacy

The Madison Community Foundation (MCF) recognizes that its efficient operation requires the maintenance and management of extensive information that is considered privileged. This may include sensitive information that has been shared with or developed by MCF staff, board or volunteers on a confidential basis (these “Records” are construed to mean all files, including electronic data, containing information on donors or prospective donors to MCF). Donors and prospects may be attracted to MCF on the basis of its ability to assure temporary or permanent anonymity. Protecting donor confidentiality is an essential part of providing good service to donors.

- Confidentiality of Records: The Foundation staff shall be responsible for maintaining the confidentiality of donor and prospect records, as well as fund information. MCF's auditors, legal counsel and other contractors are authorized to review donor/prospect and fund records as required for the purposes for which they are engaged. All persons accessing donor/prospect or fund records in the conduct of MCF business shall maintain the confidentiality of said records.
- Fund advisors (fundholders) have full access to obtain or view information pertaining to their own fund, including contact information and donation amounts for donors contributing to the fund, unless those donors expressly request anonymity.
- Staff may share information with donors pertaining to their own gifts.
- Staff may share information with grant recipient organizations pertaining to the grant award amount, the fund from which the grant was recommended, and the fund advisor name, unless otherwise requested by the fund advisor.
- Copies of confidential information shall not be held outside MCF's office for extended periods, and are to be destroyed as soon as possible or as guided by the Document Retention and Destruction Policy.
- Publication of Donor Names: Unless otherwise requested by the donor, the names of all individual donors may be printed in MCF's annual report and/or in other publications. MCF may categorize and tier these donor lists based on summary gift amounts but will not publish specific individual gift detail without the permission of the donor. Unless otherwise specified in accompanying documents, donors making gifts to MCF by bequest or other testamentary device are deemed to have granted such permission.
- Memorial/Tribute Gifts: The names of donors (but not gift amounts) of memorial or tribute gifts may be released to the honoree, next of kin, or appropriate member of the immediate family, unless otherwise specified by the donor.



Confidentiality & Donor Privacy Policy

- **Anonymous Gifts:** Foundation staff members are authorized to accept anonymous gifts to MCF, and to handle them appropriately. The name of the donor and amount of the gift may be withheld from the Board of Governors, fund beneficiary or grantee at the President's discretion if so requested by the donor. When made known to Board members, they will respect the anonymity of any such gift.
- **No Disclosures to Third Parties:** MCF shall not release to third parties or allow third parties to copy, inspect or otherwise use MCF records or other information pertaining to the identification of a donor or donor's gifts. No disclosures to third parties of such information, including addresses and demographic information, shall be made without the donor's consent.
- **Public Disclosure:** MCF will comply with both the letter and spirit of all public disclosure requirements, including the open availability of its Form 990 tax returns. This Confidentiality and Donor Privacy Policy shall not be construed in any manner to prevent MCF from disclosing information to taxing authorities or other governmental agencies or courts having regulatory control or jurisdiction over MCF.

I have read the Madison Community Foundation Confidentiality & Donor Privacy Policy and agree to abide by it.

Name (please print)

Signature

Date

I am a (check one):

Board Member Committee Member

Staff Member / Contract Employee

Volunteer

Approved & adopted by the MCF Board of Governors
December 10, 2014