



COMMUNITY FOUNDATION FOR NORTHEAST MICHIGAN

CONFIDENTIALITY POLICY

The Community Foundation for Northeast Michigan 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 Executive Director or the Board President. As used in this Policy, the term "Foundation personnel" includes the Foundation's directors and officers, employees, agents, fiduciaries, consultants and volunteers.

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: Unless otherwise requested by the donor, the Foundation may publish the names of individual donors in the Foundation's Annual Report and other reported listings. In the case of memorial gifts, the Foundation will provide the names of donors to members of the immediate family unless the donor has requested anonymity. The Foundation will not disclose the amount of the gift. The Foundation may accept anonymous gifts to it on a case by case basis. For these gifts, the Foundation will enter the gift into its database under the donor's name, but will check the "anonymous gift" box to ensure that the name does not get published on any lists.

Confidentiality with respect to Grant Applicants and Grantees: The Foundation will protect financial and personal information that applicants submit to it. This includes information provided by applicants for grants to individuals such as scholarships. The Foundation may disclose the identity of grantees and the amount awarded.

Confidentiality of Foundation Business: Except as authorized by the Foundation's board, or by an appropriate board committee, discussions and records of the Foundation's operations are generally not to be disclosed. This includes information about the

Foundation's financial operations, fundraising, investments, personnel, grantmaking, and contractual relationships. The positions of individual directors, officers, employees, agents, fiduciaries, and volunteers should not be discussed, even within the Foundation, except in the course of official Foundation meetings and processes where those subjects are discussed.

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;
- The Foundation's investment rate of return report.

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.

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

Printed Name

Signature

Date: _____

I am a: _____ **Board Member** _____ **Staff Member** _____ **Volunteer**
 _____ **Consultant/Contractor**

This policy was approved by the CFNEM Board of Trustees on March 10, 2015.