

## Confidentiality and Privacy Policy

Approved September 20, 2016

The Quad Cities Community Foundation 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 Quad Cities Community Foundation also requires respecting the confidentiality of discussions that take place and information that is shared in the course of conducting the Quad Cities Community Foundation's business.

Information in the possession of the Quad Cities Community Foundation and discussions of business should generally be presumed to be confidential. All employees, Board members and volunteers at every level are responsible for maintaining confidentiality.

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 CEO. Staff may direct such questions to their supervisor or Vice President.

### Confidentiality of Donor Information:

Except as required by law, the Quad Cities Community Foundation will not disclose information about a donor or a donor's gift. However, unless otherwise requested by the donor, the Quad Cities Community Foundation may publish the names of individual donors in the Quad Cities Community Foundation's Annual Report and other reported listings. In the case of memorial gifts, the Quad Cities Community Foundation will provide the names of donors to members of the immediate family unless the donor has requested anonymity. The Quad Cities Community Foundation will not disclose the amount of any gift without the donor's consent. The Quad Cities Community Foundation may accept anonymous gifts on a case by case basis. Fund information and agreements may only be shared with authorized persons, unless authorization is obtained from the CEO or Vice Presidents.

### Confidentiality with respect to Grant Applicants and Grantees:

The Quad Cities Community Foundation will not disclose the identity of grant applicants except as necessary to process the application and will protect financial and personal information that applicants submit to it. This includes information provided by applicants for grants to individuals such as scholarships and hardship assistance. Except in the case of hardship assistance grants to individuals, the Quad Cities Community Foundation generally disclose the identity of grantees and the amount awarded

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### Confidentiality of Foundation Business:

Except as authorized by the Quad Cities Community Foundation board, or by an appropriate board committee, discussions and records of the Quad Cities Community Foundation's operations are generally not to be disclosed. This includes information about the Quad Cities Community 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 Quad Cities Community Foundation except in the course of official Quad Cities Community 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 Quad Cities Community 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 Quad Cities Community Foundation's annual report or independent audit once it has been accepted by the Board.
- The Quad Cities Community 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 Quad Cities Community Foundation's investment and spending policies.

### Protection of Confidential Information:

Employees and volunteers who have executed a copy of this policy may access confidential information necessary to the performance of their functions. Employees and volunteers are expected to exercise sound judgment in securing information taken outside the Quad Cities Community 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. Security procedures including locked files, computer access limitations, and shredding will be used when appropriate.

### Penalties:

Penalties for violating this policy can include sanction or termination of employees and removal of Board members and volunteers.