



COMMUNITY FOUNDATION OF NORTHERN COLORADO

Confidentiality Policy Adopted February 15, 2022

Introduction

The Community Foundation of Northern Colorado (hereinafter the “Foundation”) maintains and manages information that is confidential. This includes information about donors, prospective donors, grantees, prospective grantees, and wealth advisors and their firms. The effective functioning of the Foundation 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 of Trustees has adopted this policy on confidentiality to assist the Foundation’s directors, officers, employees, agents, fiduciaries, constituents, 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. As used in this policy, the term “Foundation personnel” includes the Foundation’s directors, 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

Except as required by law, the Foundation will not disclose information about a donor or a donor’s gift. However, 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 any gift without the donor’s consent. The Foundation may accept anonymous gifts on a case-by-case basis.

Not Confidential

- The name of the fund.
- The date the fund was established.
- The type of fund (i.e., Donor Advised, Designated).
- The purpose of the fund (if provided by fund advisors).

Discussions with Donors and Prospective Donors

Financial matters and other sensitive information disclosed in discussions between donors or prospective donors and Foundation personnel will be considered confidential unless the donor or prospective donor advises otherwise. Likewise, conversations with professional advisors representing donors and potential donors will be considered confidential.

Confidentiality with respect to Grant Applicants and Grantees

The 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. 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 Foundation will generally disclose the identity of grantees and the amount awarded.

Confidentiality of Foundation Business

Except as authorized by the Foundation's board, or by the Foundation President/CEO, discussions and records of the Foundation's internal operations are generally not to be disclosed publicly.

Exceptions

This policy does not apply to disclosures to attorneys, accountants and other professionals aiding 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.
- 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.

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. Reference the IT Systems & Security Policy for more details.

Penalties

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