

The **Adams County Community Foundation** maintains and manages much information that must be kept confidential. This includes information about donors, prospective donors, grantees, prospective grantees, and professional advisors and their firms. The effective functioning of the Community Foundation also requires respecting the confidentiality of discussions that take place and information that is shared in the course of conducting Community Foundation business.

The Community Foundation's Board has adopted this Confidentiality Policy to assist the Community 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 Community Foundation's CEO and/or the board chair**. As used in this Policy, the term "Community Foundation personnel" includes the Community Foundation's directors and officers, employees, agents, fiduciaries, consultants and volunteers.

**General Rule:** Information in the possession of the Community Foundation and discussions of Community Foundation business should generally be presumed to be confidential. All Community Foundation personnel at every level are responsible for maintaining confidentiality.

**Confidentiality of Donor Information:** Except as required by law, the Community Foundation will not disclose, sell, rent, trade, or otherwise release, information about a donor or a donor's gift. However, unless otherwise requested by the donor, the Community Foundation may publish the names of individual donors in the Community Foundation's Annual Report and other reported listings. In the case of tribute or memorial gifts, the Community Foundation will provide the names of donors to members of the immediate family unless the donor has requested anonymity. The Community Foundation will not disclose the amount of any gift without the donor's consent. The Community Foundation may accept anonymous gifts to it on a case-by-case basis.

**Confidentiality with respect to Grant Applicants and Grantees:** The 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 Community Foundation will generally disclose the identity of grantees and the amount awarded.

**Confidentiality of Community Foundation Business:** Except as authorized by the Community Foundation's board, or by an appropriate board committee, discussions and records of the Community Foundation's operations are generally not to be disclosed. This includes information about the 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 Community Foundation, except in the course of official 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 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 Community Foundation's annual report or financial review once it has been accepted by the board.
- The 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 Community Foundation's investment and spending policies.
- The Community Foundation's Endowment Pool's Investment Performance.

**Protection of Confidential Information:** Community Foundation personnel who have executed a copy of this policy may access confidential information necessary to the performance of their functions. Community Foundation personnel are expected to exercise sound judgment in securing information taken outside the 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.

**Penalties:** Penalties for violating this policy can include sanction or termination of employees and removal of board members, volunteers or consultants/contractors.

**I have read the Adams County Community Foundation Policy on Confidentiality and agree to comply with it.**

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**Printed Name**

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**Signature**

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**Date**

**I am a (circle one)**

**Board Member - Staff Member – Volunteer- Consultant/Contractor**

Adopted by the Board of Directors: August 13, 2018  
Revised and adopted by the Board of Directors: August 9, 2021