

(Approved by Board of Directors on 8/1/19)

1.30 Confidentiality

Purpose:

The Community Foundation of Central Illinois maintains and manages information that must be kept confidential. 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. This policy on confidentiality is established to remind all those in possession of sensitive information regarding the operations of CFCI, including information pertaining to donors, prospective donors, donees, grantees, and prospective grantees, wealth advisors and their firms of the Community Foundation of Central Illinois (“CFCI” or “the Foundation”), that CFCI will protect their privacy and confidential information.

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 obligations and 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 CEO or the board chair. 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: 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.

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 scholarship 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 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 during official Foundation meetings and processes where those subjects are discussed.

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 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.

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.

Principle:

Unless or until proper authorization is received or the information has been released publicly at the direction of the CEO or the Board of Directors, each board member, committee member, officer, employee and volunteer must keep in strictest confidence any information pertaining to the operations of CFCI including, but not limited to, information regarding donors, prospective donors and donees; donations received or receivable; and grants made or to be made by CFCI. In general, it is expected that everyone in possession of sensitive information will be discreet as to all matters being handled by CFCI.

Procedure:

Confidential Information: Confidential Information includes any oral or written information provided to, or developed by, CFCI which, in any way, is descriptive of the operations of CFCI or identifies a specific person, either directly or indirectly, who is an existing or potential donor or donee of CFCI. Such information shall be considered confidential unless or until proper authorization is obtained or the information is publicly

released. Upon receipt of authorization the information will no longer be considered Confidential Information.

Disclosure of donor/donee information: Except as required by law, no board member, committee member, officer, employee or volunteer shall distribute Confidential Information regarding a donor or a donee without express authorization by the person identified in the information.

Disclosure of fundraising information: Confidential Information obtained during the course of fundraising activities, may not be used by any board member, committee member, officer, employee or volunteer for any purpose outside of official CFCI operations.

Disclosure of financial information: Confidential Information regarding financial and investment information of donors, including their identity, gift amounts or the nature of any gift, may not be distributed without express authorization by the donor. Such information may not be used by any board member, committee member, officer, employee or volunteer for personal gain.

Disclosure of investment information: CFCI is a significant private investor and receives substantial confidential information in the performance of its investment portfolio, gift acceptance and stewardship obligations. Unless or until authorized or publicly released, no board member, committee member, officer, employee or volunteer may use such Confidential Information for personal purposes or transmit such information to others except while performing his or her duties on behalf of CFCI.

Disclosure of matters considered at Board and Committee Meetings: Discussions held during all CFCI meetings at which Confidential Information is disclosed shall be deemed confidential. This includes any oral or written information provided by board members, committee members, officers, employees and volunteers including, but not limited to, all information concerning potential conflicts of interest.

Enforcement: Any violations of this policy may be cause for termination of employees and removal of board members as appropriate, without prior warning.

Statement of Confidentiality Forms: Upon request, Interested Parties shall acknowledge receipt of this Policy and shall reaffirm, at least annually, their understanding and compliance with the Policy. CFCI shall provide a format for this purpose; please refer to the CFCI Conflict of Interest and Confidentiality form.