



## Confidentiality Policy

Pikes Peak 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 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 of Trustees has adopted this Confidentiality Policy to assist the Trustees, executive 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 Chief Executive Officer or Chairperson of the Board. As used in this Policy, the term "Foundation personnel" includes the Foundation's Trustees and executive officers, employees, agents, fiduciaries, consultants, and volunteers.

### **I. 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.

### **II. Confidentiality of Donor Information**

Except where as required by law, the Foundation will not disclose information about a donor or a donor's gift in any capacity. 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.

### **III. Confidentiality with respect to Grant Applicants and Grantees**

The Foundation will not disclose the identity of grant applicants except as necessary to process a grant application and will protect financial and personal information that applicants submit on an application. This includes information provided by applicants for grants to individuals such as scholarships. Generally, the Foundation will disclose the identity of grantees and the amount awarded.

### **IV. 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, executive 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.

### **V. 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;
- Investment performance;

- Gift Acceptance Policy;
- Fee Schedule;
- Confidentiality and Conflict of Interest Policies;
- Non-discrimination Policy; and
- Whistleblower Policy

## **VI. 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.

## **VII. Penalties**

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

## Confidentiality Policy

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

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

\_\_\_\_\_

Printed Name

I am a:  Trustee  Staff Member  Committee Member  Consultant