

Friends of Hamilton County Park
Donor Confidentiality Policy
December 2011

The Friends of Hamilton County Parks (FHCP) recognizes that its efficient operation requires the maintenance and management of extensive donor and prospect records. These records may contain sensitive information that has been shared with or developed by FHCP staff or volunteers on a confidential basis. ("Records," as used herein, is construed to mean all files, including electronic data, containing information on donors or prospective donors to FHCP) Donors and prospects may be attracted to FHCP on the basis of its ability to assure temporary or permanent anonymity. Protecting donor confidentiality is an essential part of providing good service to donors. FHCP maintains the highest level of confidentiality with respect to donor information. Additionally, care is taken to preserve confidentiality of discussions that take place and information that is shared in the course of conducting FHCP business.

This policy codifies the position of FHCP on confidentiality.

1. Confidentiality of Record: The Executive Director shall have ultimate responsibility for maintaining the confidentiality of donor and prospect records, as well as fund information. Records will normally be available to staff as needed to fulfill their duties. At the discretion of the Executive Director, staff may make all or part of any record available to FHCP' Board of Directors and other related parties to assist them in executing their specific responsibilities. FHCP' auditors, legal counsel and other contractors are authorized to review donor/prospect and fund records as required for the purposes for which they are engaged.

All persons accessing donor/prospect or fund records in the conduct of FHCP business shall the confidentiality of said records. Staff may share information with donors, fund beneficiaries, and grantees pertaining to their own gifts, funds, grants, etc. Except in those instances, any copies of confidential information shall not be held outside FHCP offices for extended periods, and are to be destroyed as soon as possible.

2. Publication of Donor Names: Unless otherwise requested by the donor, the names of all individual donors may be printed in FHCP's annual report and in other appropriate listings. FCHP will not publish the amount of any donor's gift without the permission of the donor. Unless otherwise specified in the document, donors making gifts to FCHP by bequest or other testamentary device are deemed to have granted such permission.

3. Memorial/Tribute Gifts: The names of donors of memorial or tribute gifts may be released to the honoree, next of kin, or appropriate member of the immediate family, unless otherwise specified by the donor. Gift amounts are not to be released without the express consent of the donor.

4. Anonymous Gifts: The Executive Director is authorized to accept anonymous gifts to FHCP, and to handle them appropriately. The name of the donor and size of the gift may be withheld from the Board of Directors at the Executive Director's discretion. When made known to Board members, they will respect the anonymity of any such gift.

5. Giving Categories: If giving categories have been stipulated for a specific fund drive, challenge grant, or project, or as part of FCHP's ongoing recognition program, then the donors, unless they otherwise specify, are deemed to have given permission for FHCP to publish their names associated with the particular giving category. Similarly, FCHP may publish giving

categories associated with donor names in its annual report, and unless a donor specifies otherwise.

6. No Disclosures to Third Parties: Except as otherwise set forth herein, FCHP shall not release to third parties or allow third parties to copy, inspect or otherwise use FCHP records or other information pertaining to the identification of a donor or donor's gifts. No disclosures to third parties of such information, including addresses and demographic information, shall be made without the donor's consent, except where required by law.

7. Confidentiality of Society Business: Discussions that take place in the context of FCHP's operations require discretion, including discussions pertaining to grant-making, personnel issues, development activities, operational fundraising, investment management, etc. The positions or statements of individual board members, advisors, or staff should not be discussed outside of official FCHP meetings and processes. Likewise, the content of FCHP's business, including documents or FCHP analyses of documents, should not be discussed or shared outside official meetings and processes.

8. Public Disclosure: FCHP will comply with both the letter and spirit of all public disclosure requirements, including the open availability of its Form 990 Tax Return. This Confidentiality Policy shall not be construed in any manner to prevent FCHP from disclosing information to taxing authorities or other governmental agencies or courts having regulatory control or jurisdiction over FCHP. However, all staff, volunteers, and contractors must hold strictly confidential all information of a private nature, including, but not limited to, all items explicitly discussed in this policy.

Consequences of Policy Violation: Violations of the Confidentiality Policy are very serious, and may result in disciplinary action, including dismissal for employees or contractors, or removal from the Board or any committee for volunteers.