



Confidentiality Policy

Purpose: Donors, grantees, and scholarship applicants, among others, entrust the Yampa Valley Community Foundation “Foundation” with important information relating to personal and business affairs. By safeguarding and keeping confidential the information received, the Foundation earns the respect and further trust of such persons. To protect this trust and confidentiality, the Foundation’s board of trustees (the “Board”) has adopted this Confidentiality Policy to assist the Foundation’s trustees, officers, and employees in fulfilling their confidentiality obligations.

General Rule: Information in the possession of the Foundation includes documents, data or other information (which may be in the form of printed materials, electronic data, oral statements or other formats) of a personal or private nature. In addition, 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. Such information and discussions may relate to the Foundation, its employees, investments and investment managers, donors and potential donors, grantees and potential grantees, and scholarship applicants, and may include, but is not limited to, names, phone numbers, addresses, social security numbers, financial information demonstrating need, medical information, giving history and place of employment. Such information is to be considered confidential whether or not it is labeled or identified as “confidential” (the “Confidential Information”).

Except as required for legitimate business purposes of the Foundation, Confidential Information may not be directly or indirectly published or otherwise disclosed to any third party, or used for personal gain. The use of particular types of Confidential Information for legitimate business purposes of the Foundation is discussed below. While this 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 and whether information may be disclosed should be directed to the Executive Director, who may consult with the Board Chair, if necessary.

Donor Information: Except as required by law, the Foundation will not disclose information about a donor, a prospective donor, or a donor’s gift. However, unless otherwise requested by a donor, the Foundation may publish the names of individual donors in the Foundation’s Annual Report. 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.

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 contained in the application. This includes information provided by applicants for grants to individuals such as scholarships and emergency and disaster assistance. Except in the case of hardship assistance grants to individuals, the Foundation will generally disclose the identity of grantees, including scholarship recipients, and the amount awarded.

Foundation Business: Except as authorized by the Board, or by an appropriate Board committee, discussions and records of the Foundation’s operations may not be disclosed. This includes information about the Foundation’s financial operations, fundraising, investments, personnel, grantmaking, and contractual relationships. The opinions of individual trustees, committee members, officers, and

employees should not be disclosed, 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 providing assistance to the Foundation. It also does not apply to disclosures to tax authorities, government agencies, courts, or as otherwise required by law.

This Policy does not apply to public documents and the information contained in them (for example, the Foundation's Form 990 as required to be publicly disclosed)

Enforcement: Each trustee, officer, and employee shall sign a statement acknowledging he or she has received a copy of this Policy, has read and understands it, and agrees to comply with it. If the Board has reasonable cause to believe such a person has failed to comply with this Policy, the Board may counsel the person regarding such failure and, if the issue is not resolved to the Board's satisfaction, may consider additional corrective action as appropriate.

Protection of Confidential Information: Foundation personnel may access Confidential Information necessary to the performance of their Foundation duties. 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.

CERTIFICATION

The undersigned, as Secretary of the Yampa Valley Community Foundation, hereby certifies the foregoing Confidentiality Policy was duly adopted by the Foundation effective as of the 18th day of July in 2019.

Kathryn Pedersen
Secretary