



Confidentiality Policy

The Northwest Connecticut Community Foundation has an ethical and legal obligation to respect the privacy of donors, prospective donors, grantees, applicants, volunteers, directors, and staff, and to protect, safeguard, and maintain any information it acquires that is deemed confidential by its nature or definition.

Confidential Information Defined

The term "confidential information" shall mean any and all information relating to the Foundation's business operations, including but not limited to (i) information provided by the Foundation that is generally treated as proprietary or confidential; (ii) information that is marked "confidential" and shall include, without limitation, data, compilations, programs, techniques, lists, processes, business practices, plans, proposals, financial information, and any information pertaining to actual or potential donors, grantees, applicants, directors, volunteers, staff, vendors, or others having a relationship with the Foundation; (iii) sales and marketing information, and training and operations materials; (iv) employee information and personnel records; and (v) financial information relating to the business or affairs of the Foundation.

Confidential information shall not include information that becomes available to, or is in the possession of, the Foundation or its employees, volunteers, agents, or advisors on a non-confidential basis, including information that is public in nature, independently developed, or arising from a source not bound by the Foundation's confidentiality policy.

Communication of Information

Foundation employees, volunteers, agents, and advisors shall diligently protect all confidential information against loss by inadvertent or unauthorized disclosure or use. Without prior written consent of the Foundation, employees, volunteers, agents, and advisors of the Foundation shall not disclose any confidential information to any other person or entity regardless of reason.

Return of Information

The Foundation directs that all confidential information shall be returned or, if requested by the Foundation, destroyed immediately. Recipients of confidential Adopted: 2/28/2006

information shall, upon request by the Foundation, provide a sworn affidavit to the Foundation that all confidential information has, in fact, been destroyed or returned.

Miscellaneous Provisions

As directed by the Foundation's board of directors, individuals will be advised of their responsibilities and obligations to the confidentiality policy and shall sign the attached acknowledgement.

Copies of written confidential information shall be made only in quantities as reasonably necessary to further the business of the Foundation

Employees and directors are bound by the existing regulations and procedures as outlined in current policy manuals, Foundation bylaws, The Declaration of Trust, and all supporting governance documents.

Board, committee and staff members, and volunteers present at board or committee meetings shall not disclose to anyone outside the Foundation the statements, positions, or votes by any board or committee members on actions taken by the board or committees.

The "general sense of the board" on a particular matter may be conveyed to an applicant, grantee, vendor, or donor when sharing such information is helpful in conveying the board's concerns and when permission to disclose such information is granted by the board.

Executive Sessions: The minutes of the board will indicate when the board goes into executive session but shall not normally reflect any of the topics of discussion that occur in executive session. However, when the board takes an action in executive session that needs to be recorded, the board Chairperson will provide the text to be included in the official minutes of the meeting.

Board and Program Committee Agendas: Any agenda prepared for the board, a committee, or staff is considered confidential and should be treated as an internal document restricted for Foundation use. No portion of any agenda may be shared, in written or oral form, with any individual or with any organization outside the Foundation. This includes information on any grant requests received by the Foundation. Exceptions can be made with board approval. The Foundation will not release to third parties—or allow third parties to copy, inspect, or otherwise use—information compiled for the purpose of applying to the Foundation for funds, which has been designated by the applying organization or individual as confidential. Adopted: 2/28/2006

Personal Information on Board and Staff Members: The home addresses, telephone and fax numbers, or e-mail addresses of the board, committee members, volunteers, and staff are considered confidential and will not be shared internally or externally without the express consent of the person whose information is to be disclosed.

Information on a Donor's Fund: All information concerning a donor's fund, other than information published in the annual report, newsletter, or other Foundation publication shall remain confidential unless approved by the donor. This includes fund size, grant information, fund agreements, and donor correspondence.

Information on Donors and Prospects: All information obtained about a donor or prospective donor will remain confidential unless otherwise authorized by the donor or prospective donor. The Foundation will not share, sell, or transfer its mailing lists, databases, or any donor, potential donor, grantee, or potential grantee information with any individual or entity.

Separation of Employment/ End of Volunteer Term: When a Foundation staff member, board member or committee member or vendor ceases to serve, for any cause, the Foundation in his/her capacity as a paid employee, vendor or volunteer, all Foundation information provided to, or accessible by that individual by virtue of his/her association with the Foundation is considered to be confidential (including confidential information as outlined in this policy) and the same shall be returned to the Foundation, destroyed or electronically deleted and shall not be utilized for any reason without prior Foundation approval.

The policy will apply to all Foundation volunteers (including directors and committee members), staff and contracted individuals.

Consistent with the guidelines for compliance set forth in the National Standards for U.S. Community Foundations, the board of directors of The Community Foundation of Northwest Connecticut, Inc., has approved this Confidentiality Policy on February 28, 2006.

Approved by:

The Northwest Connecticut Community Foundation board of directors at a duly authorized board meeting held on February 28, 2006. Original signed by JoAnn Ryan 2/28/2006