

# DONOR PRIVACY POLICY:

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The Gateway Second Chance Foundation, Inc., (hereinafter the "Foundation"), is committed to protecting our donors' privacy. Our donors expect that we will use their support wisely. They also place their faith and trust in us concerning **the personal information that they may share with their gifts. We value our donors' trust and we recognize that** maintaining this trust requires us to be transparent and accountable to our supporters and the public at all times. An organization that deals with individuals and information about individuals in its daily operations and fundraising activities must secure that information. This policy will help ensure that all personal information is properly collected, used only for the purposes for which it is collected, and is irretrievably disposed of in a secure and timely manner when it is no longer needed.

**In this Policy, "personal information" means information that is recorded in** any form, both fact and opinion and that can be used to distinguish, identify or contact a specific individual. It does not include publicly obtainable information **such as names, addresses and telephone numbers. "Donor" refers to any individual or organization that contributes funds, securities or property to the Foundation. For purposes of this policy, "Employee" describes both paid and** volunteer workers for The Gateway Second Chance Foundation.

It is vital for the Foundation to have knowledge about its supporters and those people who provide the necessary funding. In order to be successful during a campaign, strong donor relationships must be established and cultivated. Information is the key to any relationship. Due to the sensitive nature of personal information disclosed by a Donor or obtained by the Foundation, the Foundation shall at all times abide by this Policy.

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## Accountability

The Foundation and its employees are responsible for all Donor personal information in our possession. Each department of the Foundation shall establish, maintain, and revise practices and procedures to ensure compliance with this Policy. Every reasonable precaution shall **be taken to protect and preserve the confidentiality of our Donors'** personal information. All employees, agents and authorized service providers of the Foundation are individually **required to safeguard each individual Donor's personal information. Any** outside contractors or third party service providers are selected with due care and must abide by this Policy. External service providers shall be required to agree to protect any personal information of Donors, use it for only the purposes set out in the scope of the contract with the Foundation, and to not keep the personal information on file.

Donors may notify the Foundation of a privacy-related issue or grievance by contacting the Assistant Treasurer at [donors@gatewaysecondchance.org](mailto:donors@gatewaysecondchance.org). We will provide information about our privacy procedures and investigate the complaint. If a problem is discovered during the review, we will take all appropriate steps to revamp our policies and procedures if necessary.

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## Use and Disclosure of Personal Information

The Foundation collects, uses and discloses personal information only for certain purposes that are identified to the Donor. We may use it to establish and manage our relationship with a Donor, as well as providing requested information. Personal information can also help us understand a Donor and identify preferences and expectations. The main uses will involve raising money to reach our campaign goals and to process gifts and return appropriate receipts. To publicly recognize and thank them for their generosity, we occasionally release a list of our Donors. In such cases, other organizations and third parties will have access to our Donor names and in some cases donation amounts.

The Foundation holds special events to create publicity for our campaign, thank supporters, and raise funds. At some of these events Employees may obtain personal information. If so, Donors will be advised of this fact and the information related to the event will be disposed of properly when it is no longer needed.

We collect Donor information for internal use only, and just to the extent required for our purposes. We obtain relevant personal information about Donors lawfully and fairly.

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## Sharing or Selling of Personal Information

The Foundation does not sell, trade or rent the information and contents of active Donor files to others. The Foundation will not share Donor e-mail address to third parties. The Foundation may share Donor postal mailing lists with other organizations for a single use. An organization that receives the Foundation's **mailing list must agree to** strict parameters which limit the use of the data. For example:

1. The names and mailing addresses will only be used for a specific project;
2. The Foundation must approve the contents of the mailing piece before it is sent to the members of our Donor list;
3. The data file containing the Donor mailing list will not be forwarded to any other person or entity except when necessary to complete the specific project;
4. No copies of any type of the data file will be made by the receiving organization; and
5. The data file of the names and addresses will be returned or destroyed when the project is completed.

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## Donors' Consent

The Foundation only uses and discloses personal information with Donor permission. Donor permission can be in writing or implied, either verbally and/or electronically. A Donor may withdraw permission to collect, use, and disclose personal information at any time by giving the Foundation reasonable notice, subject to legal or contractual obligations. A Donor may opt out of sharing of any information, including name and address, by completing the form, found at Appendix A, and submitting it to the Foundation or by emailing an opt out request to [donors@gatewaysecondchance.org](mailto:donors@gatewaysecondchance.org). When a Donor has communicated to the Foundation a desire to opt out of the disclosure of his or her information, the Foundation **will not include the Donor's data to another organization or third party**.

Donors who wish to avoid any public recognition may inform the Foundation when making a pledge or gift. The option to remain anonymous shall be made available to Donors by the Foundation and its appropriate employees. This request for anonymity shall be honored by the Foundation until the Donor informs us otherwise.

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## Custody and Care of Personal Information

The personal information in our possession shall be kept accurate and up-to-date. Donors may always correct their personal information if they believe that our records are not correct. If a Donor feels that any of our information about them is inaccurate or **incomplete, the Donor has the right to ask us to change it or delete it. If a Donor's personal information is wrong in any way, the Foundation will make the required changes.**

The Foundation operates under the assumption that any Donor or Donor prospect has the right to review his or her record maintained by our organization. Donors may request in writing to see personal information about them that is in the possession of the Foundation. Donors also have the right to know how the information is obtained and used. We will respond to Donor requests within a reasonable time (within 30 days or less) by either providing copies of the documents or access to the information. The Foundation will generally respond at no charge to the Donor, but depending on the nature of the request and the amount of information requested, we reserve the right to charge a

reasonable amount. In some situations, the Foundation may not be able to provide access to all the personal information held on a Donor. Exceptions will be limited and specific as permitted or required by law, and the reasons for non-disclosure shall be communicated to the requesting party.

The Foundation **will keep Donors' personal information only as long** as it is necessary to satisfy the purposes for which it was obtained, or as legally required. Access to Donor file materials containing personal information is restricted to Foundation Employees and authorized service providers who need it to do their jobs.

The Foundation has established appropriate technical, physical and organizational security procedures to protect **Donors' personal information against loss, theft, unauthorized use, disclosure, or modification. These procedures will** be monitored and reviewed at least annually and when needed to ensure their continued effectiveness. The safeguards employed by the Foundation include, but may not be limited to, the use of limited access storage areas, locked files, and the use of encryption, secure servers, and computer workstation passwords. Appropriate measures will be undertaken when personal information is destroyed in order to prevent access or inadvertent disclosure to any unauthorized parties.

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## Website

Users of the Foundation's **internet resources** should refer to the Privacy Policy that is currently located at <http://www.GatewaySecondChance.org/docs/PrivacyPolicy.pdf> .

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## Employee Acknowledgement

All Foundation employees shall read this Policy and sign a written acknowledgement. A sample copy of the Employee Acknowledgement is attached as Appendix B.

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Appendix A



**The Gateway Second Chance Foundation**  
Donor Privacy Policy Form

The Gateway Second Chance Foundation (“The Foundation”) is committed to protecting the privacy of our donors and the personal information that they may share with us or that we hold. We value our donors’ trust and recognize that maintaining this trust requires our institution to be transparent and accountable to our supporters and the public at all times. All information about any financial transactions between donors and the Foundation is considered highly confidential and safeguarded at all times. Occasionally, the Foundation receives requests from organizations to share only names and mailing addresses for a single use. If you wish, you may opt out of sharing of any of your personal information by completing this form and:

- Mailing it to The Gateway Second Chance Foundation, Attention: Assistant Treasurer “Opt Out,” 6368 Coventry Way Suite #254 Clinton, MD 20735; or
- Emailing [membership@gatewaysecondchance.org](mailto:membership@gatewaysecondchance.org) with “Opt Out” in the subject line.

\_\_\_\_ I wish to opt out of sharing any of my personal information, including my name and mailing address, to any third party.

Name \_\_\_\_\_

Mailing Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Email Address \_\_\_\_\_

If you have any other comments or suggestions/feedback, please add them here.

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## Appendix B

### Donor Privacy Policy Employee / Volunteer Acknowledgment

The Gateway Second Chance Foundation (the "Foundation") is committed to protecting the privacy of our donors and any personal information that they may share with us or that we hold. We value our donors' trust and recognize that maintaining this trust requires us to be transparent and accountable to our supporters and the public at all times. The Donor Privacy Policy describes important information about the steps necessary to safeguarding all personal information about our donors.

I acknowledge that I have received and read the Foundation's current Donor Privacy Policy.

I understand that every employee and volunteer is responsible for abiding by the Donor Privacy Policy. In the event that a situation occurs that impacts a donor's personal information that is not specifically discussed in the Donor Privacy Policy, I understand that I should consult with my immediate supervisor regarding any questions not addressed in the Donor Privacy Policy.

I will take every reasonable precaution to protect and preserve the confidentiality of our Donors' personal information. I acknowledge that I am accountable if by my actions or failure to act an accidental or inadvertent disclosure of donor information occurs.

I will not share, sell or give any personal information about a donor with any outside organization or person without the donor's consent. I understand that the Foundation does not sell, trade or rent donors' email addresses to others.

I acknowledge that if I knowingly share or disclose a donor's personal information in a way which violates the Donor Privacy Policy, disciplinary action will be taken as set out in the Foundation's personnel policies. One of the options available to the Foundation when the disclosure of a donor's personal information is discovered shall be termination of the employment relationship, if deemed appropriate.

Employee's or Volunteer's Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_