



## CONFIDENTIALITY POLICY

### PURPOSE

The Community Foundation of Northern Illinois (Foundation) respects the privacy of its Corresponding Parties. Foundation Personnel may be exposed to or have access to the personal, financial, business, and deliberative information of the Foundation and Corresponding Parties. This information is confidential. It may not be disclosed or discussed with anyone for any purpose other than that required and allowed by the Foundation.

This policy governs all types of confidential and privileged information. The specific examples below are not comprehensive. All questions pertaining to the confidentiality and handling of privileged information should be directed to the President of the Foundation.

### DEFINITIONS

**CORRESPONDING PARTIES** are any persons or entities that have disclosed confidential or privileged information to the Foundation, including but not limited to donors, grant and scholarship seekers and awardees, volunteers, the Board of Trustees, suppliers, and employees.

**FOUNDATION PERSONNEL** includes the Foundation's Board of Trustees, officers, employees, community advisors and other volunteers, agents, fiduciaries, consultants and contractors.

Disclosure of confidential information may be required by statute or regulation or in the course of prudent stewardship and administration, for example, in the course of seeking legal or financial audit opinions. Disclosure may also be allowed by Corresponding Parties.

In cases where privileged information is disclosed, the Foundation will exercise due care that information is disclosed only to the intended recipients.

Generally, Foundation Personnel will not disclose or discuss confidential information:

- about donors, prospective donors, individual funds, or specific gifts;
- from professional advisors about donors or prospective donors;
- about grant and scholarship seekers or awardees;
- with beneficiaries;
- about committee deliberations; or
- that is intellectual property or business information of the Foundation.



## CONFIDENTIALITY POLICY

### CONFIDENTIALITY OF DONOR INFORMATION

The Foundation will not disclose information about a donor or a donor's gift. However, the Foundation may publish the names of individual donors in the Foundation's Annual Report and other reported listings, unless a donor has requested anonymity. In the case of memorial gifts, the Foundation may 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.

### CONFIDENTIALITY OF GRANT APPLICANT AND GRANTEE INFORMATION OF ORGANIZATIONS

The Foundation will not disclose the identity of grant applicants except as necessary to process the application. The Foundation will not publicly disclose or discuss confidential information provided by grant applicants. The Foundation will not disclose confidential information about individuals who are beneficiaries of charitable activities funded by Foundation without those individuals' consent. The Foundation routinely reports information about grantees, including the organization's name and the grant's purpose, amount, and results.

### CONFIDENTIALITY OF GRANT APPLICANT AND GRANTEE INFORMATION OF INDIVIDUALS

The Foundation will not disclose the identity of grant applicants except as necessary to process the application. The Foundation will not disclose or discuss confidential information provided by applicants for grants.

Generally, the Foundation will disclose the identity of grantees and scholarship awardees, the amount awarded, biographical information provided in the application, and/or affiliation with education institutions, except in the case of hardship assistance grants to individuals. Applicants must consent to this disclosure as a condition of applying for grants and scholarships.

Generally, the Foundation will not disclose contact information of its grantees and scholarship awardees without prior consent from awardees.

### CONFIDENTIALITY OF FOUNDATION BUSINESS

Except as authorized by the Foundation's Board of Trustees, discussions and records of the Foundation's operations may not be disclosed. This includes information about the Foundation's financial operations, fundraising, investments, personnel, grant making, and contractual relationships or information considered to be intellectual property by the Foundation.



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### EXCEPTIONS

This policy does not apply to disclosures to attorneys, accountants, and other professionals providing assistance to the foundation. However, such professionals are prohibited by the Foundation and their own professional standards from disclosing confidential information. The policy 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 of Trustees.
- The Foundation's Form 990. The Foundation is required to publicly disclose this document. The 990 does not disclose identifying or confidential information about the Foundation's donors.

### PROTECTION OF CONFIDENTIAL INFORMATION

Foundation personnel who have acknowledged receipt and understanding of this policy may access confidential information necessary to perform their functions. Foundation personnel are expected to exercise sound judgment in securing the confidential information of the Foundation in accordance with this policy.

Adopted by the Board August 17, 2016.

Reviewed by Board Secretary:

A handwritten signature in blue ink that reads "Jon Bates".

Jon Bates



COMMUNITY FOUNDATION  
OF NORTHERN ILLINOIS

POLICY

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### REVISION RECORD:

REVISION	DESCRIPTION	REVISION DATE

### REVIEW RECORD:

REVIEW DATE