



**The Center of Concern**

---

## **Donor Privacy Policy**

### **Purpose:**

**Donor privacy is very important to the Center of Concern and its donors, both for internal purposes as well as to protect donors' information against cyber or other identity theft. This policy sets forth those principles of privacy to insure such privacy.**

### **Principles of Donor Privacy:**

1. Center of Concern (COC) shall have formal procedures in place to ensure the privacy of its donors, subject to the following:
  - A. For individual donors, COC may acknowledge names of donors in annual reports and similar publications, unless a donor requests that the gift be "anonymous".
  - B. For corporate and other organizational donors we will generally publicize contributions in publicity surrounding special events, annual reports and other COC publicity, unless the donor requests that the gift be "anonymous."
  - C. COC will not sell or otherwise provide information regarding donors to any other organization.
  - D. All COC Donors have the option at any time to request that their names not be published in COC materials and/or publicity.
  - E. In case of a known security breach through a third party processing agent (PayPal, Sage, etc.) or within COC, immediate action of locking down donor data and networks, changing agency passwords and notifying of donors will be implemented to protect the privacy of COC donors and the reputation of COC.

### **2. All methods of giving are processed using only secure transactions.**

Any transaction, whether by credit card, check or other form of donation, which provides personal information about an individual, will be treated as private and protected information. This applies in every case, regardless of how a donor chooses to submit that information. If a donor elects to donate to COC online, donor giving information will be protected. At a minimum, "private and protected" includes:

- A. COC will apply the best practices in industry standards to secure personal information against unauthorized access and to preserve the accuracy and proper use of that information.

- B. All of the donor information that is obtained and maintained by COC is done through safe, private and secure systems with user names and passwords for every individual having access to the those systems.
- C. In addition, COC requires all employees to keep confidential the information that they have access to, in accordance with COC Confidentiality Policy.

Adopted: January 2014